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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION  
CHARLENE CARTER )  
 ) CIVIL ACTION NO.  
VS. ) 3:17-CV-02278-X  
 )  
SOUTHWEST AIRLINES CO., AND )  
TRANSPORT WORKERS UNION OF )  
AMERICA, LOCAL 556 )

-----  
CONFIDENTIAL  
VIDEOTAPED DEPOSITION OF  
MAUREEN EMLET  
NOVEMBER 5, 2020  
-----

ANSWERS AND DEPOSITION OF MAUREEN EMLET,  
produced as a witness at the instance of the  
Plaintiff, taken in the above-styled and -numbered  
cause on NOVEMBER 5, 2020, at 9:03 a.m., before  
CHARIS M. HENDRICK, a Certified Shorthand Reporter  
in and for the State of Texas, witness located in  
Aurora, Colorado, pursuant to the Federal Rules of  
Civil Procedure, the current emergency order  
regarding the COVID-19 State of Disaster, and the  
provisions stated on the record or attached hereto.

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18 ALSO PRESENT: MR. MACK SPURLOCK -  
19 VIDEOGRAPHER

20 MS. CHARLENE CARTER  
21 MS. LAUREN ARMSTRONG  
22  
23  
24  
25

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PROCEEDINGS

THE VIDEOGRAPHER: We are now on record. Today's date is November 5th, 2020. The time is 9:04 Central. Will the court reporter please swear in the witness?

THE REPORTER: This is the video oral deposition of Maureen Emlet, and it is being conducted remotely in accordance with the current emergency order regarding the COVID-19 State of Disaster. The witness is located in Aurora, Colorado. And counsel has agreed that I can swear in the witness.

My name is Charis Hendrick, Court Reporter, CSR No. 3469. I am administering the oath and reporting the deposition remotely by stenographic means from my home in Ellis County, Texas.

Would counsel please state their appearances and locations for the record? And the city is fine.

MR. GILLIAM: Matthew B. Gilliam for plaintiff Charlene Carter in Springfield, Virginia.

MR. CORRELL: Michael Correll for defendant Southwest Airlines in Dallas, Texas.

MR. GREENFIELD: Adam Greenfield for

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Q. Okay. And you understand that Mr. Correll accepted the subpoena on your behalf, correct?

A. Yes.

Q. Okay. And is Mr. Correll representing -- representing you at today's deposition?

MR. CORRELL: Objection. Calls for a legal conclusion.

Q. (By Mr. Gilliam) You can answer.

A. Well, I thought he was representing Southwest Airlines, so I don't know if he's representing me. I don't know if that's the legal jargon.

Q. Okay. Another quick question: Did you receive the check that we tendered to Mr. Correll for your attendance at today's deposition?

A. Yes.

Q. Okay.

MR. GILLIAM: Can we go off record and maybe have a private conversation with counsel?

MR. CORRELL: I'd prefer to have it on the record. If it's about -- if it's about the scope of my representation of Ms. Emlet, I would rather have it on the record.

MR. GILLIAM: Oh, okay. Well, I mean, I was concerned about having discussions in front

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the defendant TWU Local 556 in Dallas, Texas.

MAUREEN EMLET,  
having been first duly sworn, testified as follows:

EXAMINATION

BY MR. GILLIAM:

Q. Good morning, Ms. Emlet.

A. Good morning.

Q. My name is -- my name is Matt Gilliam and I represent plaintiff Charlene Carter in the case Carter v. Southwest Airlines Company and Transport Workers Union of America Local 556. And I am here today to ask you questions about the case. If at any point you would like a break, just let me know and we'll -- we'll take a break. And do you understand why you are here today?

A. Yes.

Q. Okay. And do you understand you are here under subpoena?

A. Yes.

Q. Okay. And did you receive the subpoena to testify?

A. Yes.

Q. Okay. And have you had the chance to review the subpoena?

A. Yes.

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of the -- the witness, is all; that's my only concern. I don't know if we could -- we can put something on the record.

MR. CORRELL: Sure. I will just tell you: We take the position that, consistent with Texas law concerning representation of corporate officers, we represent Ms. Emlet in her prior capacity as an -- as a management personnel member of Southwest Airlines. And as a result, we reserve the right to assert the privilege on behalf of Southwest Airlines or any communications concerning Ms. Emlet's services to Southwest Airlines.

MR. GILLIAM: Okay. Are we still on the record?

THE REPORTER: Yes.

MR. GILLIAM: Okay.

Q. (By Mr. Gilliam) And, Ms. Emlet, have you had the chance to confer with an attorney about the subpoena?

A. Yes.

Q. Okay. And did you have any objections to the subpoena?

A. No.

Q. Okay. All right. Now, have you been deposed before?

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1     **A. Yes.**  
2     Q. Okay. And one -- one other question, I  
3     guess. Okay. No, I think I am good.  
4     So have you read the Complaint in this  
5     case?  
6     **A. No, I don't believe that I have read the**  
7     **Complaint.**  
8     Q. Okay. Are you familiar with the claims  
9     that Ms. Carter is making in the Complaint against  
10    Transport Workers Union of America Local 556 and  
11    Southwest Airlines Company?  
12    **A. Yes.**  
13    Q. Okay. And you understand that she is --  
14    is claiming religious discrimination under Title 7  
15    of the Civil Rights Act?  
16    **A. Yes.**  
17    Q. Okay. And you understand she's claiming  
18    retaliation in connection with the Railway Labor  
19    Act; that she was terminated from her employment  
20    for exercise of her rights under that -- that act?  
21    **A. Yes.**  
22    Q. Okay. All right. And do you work with  
23    Southwest Airlines?  
24    **A. No. I am retired from Southwest Airlines.**  
25    Q. Okay. Congratulations. When did you

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1     retire?  
2     **A. December 31st of 2019.**  
3     Q. All right. And prior to your retirement,  
4     what was the last position you held with Southwest?  
5     **A. Manager of labor relations for inflight**  
6     **services.**  
7     Q. Okay. And how long did you hold that  
8     position?  
9     **A. I think it was about seven and a half**  
10    **years.**  
11    Q. Okay. And what -- what position did you  
12    hold prior to being manager of labor relations?  
13    **A. Prior to that, I was manager of inflight**  
14    **communications. Prior to that, I was an inflight**  
15    **base manager. And prior to that, a recurrent**  
16    **training supervisor. And I started my Southwest**  
17    **career as a flight attendant.**  
18    Q. Okay. How long did you work as a flight  
19    attendant?  
20    **A. 10 months.**  
21    Q. All right. During that 10-month time  
22    frame, were you a member of the union?  
23    **A. Yes.**  
24    Q. Okay. Were you a member of TWU Local 556?  
25    **A. Yes.**

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1     Q. Okay. And if I refer to TWU or Local 556  
2     or the union, you will understand today that I mean  
3     Transport Workers Union of America Local 556?  
4     **A. Yes.**  
5     Q. Okay. And how -- I guess, did you hold  
6     any elected positions with the union?  
7     **A. No.**  
8     Q. Okay. All right. And when I say union  
9     member, you understand that I mean a  
10    full-dues-paying member?  
11    **A. Yes.**  
12    Q. Okay. And if I refer to a non-member, I  
13    -- that I mean somebody who is employed in the  
14    collective bargaining agreement represented by the  
15    union, but not a full-dues-paying member.  
16    **A. Okay.**  
17    Q. You -- you understand that there are  
18    employees or flight attendants who are represented  
19    by TWU and employed in the bargaining unit, but are  
20    not full-dues-paying members?  
21    **A. I think that they are not full-dues-paying**  
22    **members. They can opt out of the international,**  
23    **but not local, I believe.**  
24    Q. Okay. Do you -- do you have a terminology  
25    you use for those persons?

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1     **A. No.**  
2     Q. Okay. Have you ever heard the term opt --  
3     "opt-outers"?  
4     **A. Yes.**  
5     Q. Okay. And who are the opt-outers?  
6     **A. The -- the flight attendants who have --**  
7     **chosen full amount of dues.**  
8     MR. GILLIAM: Did the court reporter  
9     get that response?  
10    THE REPORTER: Yes, sir.  
11    MR. GILLIAM: Okay. I don't know if  
12    my connection was bad or not.  
13    Q. (By Mr. Gilliam) Okay. And are -- are  
14    those persons also called objectors?  
15    **A. I don't know that I've ever heard that**  
16    **term used for those flight attendants.**  
17    Q. Okay. Have you heard those flight  
18    attendants be called nonmembers?  
19    **A. I am sorry, but I am not getting your**  
20    **audio right now.**  
21    Q. Okay.  
22    MR. GILLIAM: Is anybody else having  
23    trouble with my audio?  
24    MR. CORRELL: I -- I believe it's the  
25    witness who has got the issue with connection at

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1 the moment.

2 MR. GILLIAM: Okay.

3 **A. I can hear you now.**

4 Q. (By Mr. Gilliam) Okay. And for that  
5 group of people you had just described, have you  
6 ever heard the term "nonmember" used to refer to  
7 them?

8 **A. Yes.**

9 Q. Okay. All right. Now, in your position  
10 as manager of labor relations, what -- what were  
11 your responsibilities?

12 **A. My main responsibilities were to work with**  
13 **the base leadership and the union lead --**  
14 **leadership to ensure that the contract was being**  
15 **correctly applied. I was involved with cases that**  
16 **had the potential to result in discipline; to**  
17 **ensure that company policies and the inflight work**  
18 **and conduct rules were being followed and applied**  
19 **consistently.**

20 Q. Okay. And when you say that -- well, did  
21 you say that one of your responsibilities was  
22 making sure the contract was applied properly?

23 **A. Yes.**

24 Q. Okay. And by contract, are you referring  
25 to the collective bargaining agreement between the

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1 Q. Okay. Do you remember any of the flight  
2 attendants who contacted you directly?

3 **A. No.**

4 Q. Okay. Do you remember if you were ever  
5 contacted directly by a flight attendant regarding  
6 a social media policy violation?

7 **A. I don't know whether or not that was an**  
8 **issue that I discussed directly with a flight**  
9 **attendant.**

10 Q. Okay. Do you know -- do you remember any  
11 of the issues that you might have been contacted  
12 about directly?

13 **A. No.**

14 Q. Okay. All right. Now, after you learned  
15 from the base about a complaint involving a flight  
16 attendant's conduct, what -- what do you do?

17 **A. My role would be to, first of all,**  
18 **ascertain from the base leader what their**  
19 **recommendation was in the case. I would also go**  
20 **through our archive files to ensure that any**  
21 **discipline that was suggested was consistent with**  
22 **what had happened before.**

23 **I also would have conversation with**  
24 **the base leaders about whether a certain work and**  
25 **conduct rule would apply or if it was a company**

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1 union and the company?

2 **A. Yes.**

3 Q. Okay. And in -- in what ways would you  
4 make sure that the contract was being applied  
5 properly?

6 **A. Well, it -- it came into play when there**  
7 **was an allegation or a potential of a violation of**  
8 **the contract or a violation of a work and conduct**  
9 **rule or company policy. Also, to -- I didn't**  
10 **really deal with -- with the -- the noncontract**  
11 **cases where it involved pay or hours of service. I**  
12 **was more on the discipline side of things.**

13 Q. Okay. Okay. And did you get involved in  
14 investigations and discussions of flight attendant  
15 discipline where there was a potential for any  
16 discipline?

17 **A. Yes.**

18 Q. Okay. And at what stage of the  
19 investigation did you come in?

20 **A. Generally, the base would contact me once**  
21 **the fact-finding meeting had been held, and discuss**  
22 **the findings of their investigation with me.**

23 Q. Okay. Were you ever contacted by flight  
24 attendants directly?

25 **A. On rare occasion, yes.**

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1 **policy violation. And then I -- I may have done**  
2 **some research on my own if there were other areas**  
3 **that I felt needed to be addressed prior to the**  
4 **base leader making the final decision.**

5 Q. Okay. And apart from inflight, did you  
6 work with other departments at Southwest on  
7 disciplinary issues?

8 **A. I was never employed in any other -- well,**  
9 **no, that's not true. When I first started, I was**  
10 **part of inflight. And then after I joined labor**  
11 **relations, it used to be under the inflight**  
12 **department, but then they separated into a separate**  
13 **department. So I was employed by the general**  
14 **counsel department. In that capacity, I sometimes**  
15 **consulted with the labor managers of other**  
16 **departments.**

17 Q. Okay. In your -- your position as manager  
18 of labor relations, did you collaborate with other  
19 -- other departments in the investigation of flight  
20 attendant discipline?

21 **A. Occasionally, yes.**

22 Q. Okay. What were some of the departments  
23 you would collaborate with?

24 **A. The human resources business partner, the**  
25 **employee relations team, the FMLA team; those are**



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1 the ones I can think of off the top of my head.  
2 Q. Do you know what the ACT team is?  
3 A. Oh, yes. I worked with them quite a bit.  
4 Q. Okay. And what -- what sort of issues did  
5 you work with them on?  
6 A. There was a wide range. It was for  
7 accommodations. If there were -- well,  
8 accommodations that needed to be made for the --  
9 the -- a specific flight attendant or that they  
10 were requesting.  
11 Q. Okay.  
12 A. It also -- they also deal with career  
13 transitions. So I dealt with them on quite a few  
14 cases where flight attendants were no longer  
15 capable of doing the flight attendant duties,  
16 performing the flight attendant duties. And I  
17 would work with the ACT team to assist them in  
18 transitioning to different roles within the  
19 company.  
20 Q. I see. So that's what you mean by career  
21 transitions?  
22 A. Transitions, yes.  
23 Q. Okay. And did you ever deal with  
24 accommodations of a religious nature?  
25 A. I remember one in particular -- well,

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1 actually, not one. I remember a couple, yes.  
2 Q. Okay. What -- what are the two you  
3 remember?  
4 A. One flight attendant had converted to  
5 Judaism and he requested an accommodation to wear a  
6 yarmulke as part of his uniform. And then we had  
7 other flight attendants who had requested being  
8 able to wear a hijab. I am not sure that -- I am  
9 not sure that any of those flight attendants who  
10 approached me with that request actually went  
11 through with it, but I know that it was discussed.  
12 Q. Okay.  
13 A. There was -- there was another flight  
14 attendant who requested specific days off due to  
15 his religious beliefs; those are the ones that I  
16 remember.  
17 Q. Okay. And the -- the flight attendant who  
18 requested days off -- I am sorry -- did you say  
19 whether that request was granted? We may -- may  
20 have froze up.  
21 A. I -- I remember that the request for the  
22 yarmulke was granted. I don't know about any other  
23 requests.  
24 Q. Okay.  
25 A. I know that the request for specific days

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1 off was not granted. It was not a reasonable  
2 request given the flight attendant  
3 responsibilities, and also the freedom that flight  
4 attendants have to manipulate their own schedule  
5 and move trips around.  
6 Q. Okay. Do you ever remember an occasion  
7 where you and the ACT team were involved in a  
8 matter where the ACT team was considering whether  
9 an employee needed a request, but the employee had  
10 not specifically asked for a request?  
11 MR. CORRELL: Objection. Vague.  
12 THE WITNESS: Should I answer that?  
13 MR. CORRELL: Ms. Emlet, today,  
14 when I --  
15 THE WITNESS: Are you --  
16 MR. CORRELL: Just so you know,  
17 Ms. Emlet, today, when I make objections, you are  
18 permitted to proceed to answer the question as you  
19 are able unless I specifically instruct you that  
20 the information is privileged and you should not  
21 disclose it. So, in this case, yes, you may.  
22 THE WITNESS: Would -- would you --  
23 thank you.  
24 A. Do you mind repeating the question?  
25 Q. (By Mr. Gilliam) Yeah. Do you remember

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1 any occasions where you collaborated with the ACT  
2 team regarding a matter where the employee didn't  
3 make a specific request, but someone else with  
4 Southwest had determined that they needed to  
5 consider it?  
6 MR. CORRELL: Objection. Vague.  
7 A. I don't remember any cases like that.  
8 Q. (By Mr. Gilliam) Okay. Now, what -- what  
9 did the ACT team ask you to do as part of your  
10 involvement in those cases?  
11 A. Every case was individual. And so just  
12 generally speaking, the ACT team usually consulted  
13 me on items that were specific to inflight.  
14 Because they over -- they work with every  
15 department, they are not as intimately familiar  
16 with each collective bargaining agreement for each  
17 of the different work groups, nor are they as  
18 intimately familiar with the requirements for the  
19 specific jobs.  
20 And so my interaction with them  
21 usually entailed questions about would this be a  
22 reasonable accommodation given the requirements of  
23 the flight attendant job; and is it in accordance  
24 with their collective bargaining agreement.  
25 Q. Okay. Now, in -- and -- and -- and you --

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1 you made that evaluation; is that correct, whether  
2 it was in -- in accordance with the collective  
3 bargaining agreement and consistent with the  
4 requirements of a flight attendant's job?

5 **A. I don't know that I make the decision. I**  
6 **would offer the information to the ACT team. And I**  
7 **believe that, ultimately, they consulted with our**  
8 **legal department to make their final decisions.**

9 Q. Okay. And in consulting with you on those  
10 matters, did -- did you also involve the base  
11 managers?

12 **A. Occasionally, the base manager would be**  
13 **involved if they were the ones who had brought the**  
14 **concern forward on the -- on behalf of the flight**  
15 **attendant. However, I believe that all of that**  
16 **information was privileged and, therefore, the ACT**  
17 **team would not -- I wouldn't bring in the base**  
18 **manager unless they were already involved.**

19 Q. Okay.

20 MR. CORRELL: And thank you for  
21 applying that, Ms. Emlet. To the extent when you  
22 are answering questions today, you believe they  
23 call for communications with counsel, please alert  
24 us because I will instruct you not to provide that  
25 information in the deposition.

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1 THE WITNESS: Okay.

2 Q. (By Mr. Gilliam) So did you -- you -- you  
3 corresponded directly with the base managers where  
4 some sort of inquiry -- well, where they maybe  
5 brought forth an inquiry on behalf of a flight  
6 attendant?

7 **A. Possibly, yes.**

8 Q. Okay. And did you communicate with any --  
9 any other department in, I guess, doing your  
10 evaluation; whether, you know, the -- the requested  
11 accommodation was consistent with the CBA and the  
12 requirements of the job?

13 **A. I am sorry. I didn't hear the last part**  
14 **of that -- yes.**

15 Q. I'm sorry. I heard you say yes. Was that  
16 yes in response to the question? Or you -- would  
17 you like --

18 **A. Well --**

19 Q. -- the question read back?

20 **A. -- could you repeat the question?**

21 Q. Yeah.

22 **A. I didn't hear -- yes, I didn't hear the**  
23 **end of the question.**

24 Q. Okay. I -- I apologize, Ms. Emlet. I --  
25 there might be a little bit of delay between us

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1 too.

2 MR. GILLIAM: Ms. Hendrick, would you  
3 mind -- would the court reporter mind reading that  
4 back?

5 THE REPORTER: Sure.  
6 (Record read by Reporter.)

7 **A. I would not have consulted with another**  
8 **department to see if the request was consistent**  
9 **with the inflight CBA, nor the requirements for the**  
10 **flight attendant job. That was my job to know**  
11 **whether or not it was in -- in compliance.**

12 Q. (By Mr. Gilliam) Okay. In your -- I  
13 guess, your -- your experience as labor relations  
14 manager, did you ever handle any investigations  
15 involving a flight attendant with a religious  
16 discrimination complaint?

17 **A. I --**

18 MR. CORRELL: Objection. Vague.

19 **A. -- do not remember handling any -- I do**  
20 **not remember handling any -- any cases that**  
21 **involved religious discrimination complaints.**

22 Q. (By Mr. Gilliam) Do you know, as a -- I  
23 guess, a procedural matter, if a -- if labor  
24 relations would handle that sort of issue, a  
25 religious discrimination issue, or would the ACT

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1 team handle that issue?

2 MR. CORRELL: Objection. Vague.

3 **A. The ACT team and labor relations would**  
4 **work together. Ultimately, it would be the labor**  
5 **relations' responsibility to investigate. I just**  
6 **don't remember ever having any religious**  
7 **discrimination complaints brought forward.**

8 Q. (By Mr. Gilliam) Okay.

9 **A. Other than Ms. Carter.**

10 Q. Okay. Do you understand if -- or I am  
11 sorry. Do you know if employee relations handles  
12 religious discrimination issues?

13 **A. Oh, yes. Employee relations would handle**  
14 **those complaints.**

15 Q. Okay. And did -- just to make sure that I  
16 understand correctly. Did you ever work with  
17 employee relations on those types of complaints?

18 **A. I may have, but, again, I don't remember**  
19 **having any religious discrimination complaints**  
20 **brought forward that I worked on or that I worked**  
21 **with employee relations on. There -- there may**  
22 **have been one, but without going back and reviewing**  
23 **files, I just don't remember.**

24 Q. Okay. And, I guess, in your -- your time  
25 as manager for labor relations, do you recall,

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1 roughly, about how many total religious  
2 accommodation requests you dealt with?  
3 **A. I think I was only involved in a small**  
4 **handful. It wasn't really my area to make those**  
5 **decisions.**  
6 Q. Okay. Do you know if it was less than 10?  
7 **A. I am sure it -- it was.**  
8 Q. Okay. Do you know if it was less than  
9 five?  
10 **A. I don't know, but I would think it was**  
11 **less than five.**  
12 Q. Okay. All right. And, I guess, as a  
13 labor relations manager, were -- were you involved  
14 in cases with a complaint about a social media  
15 policy violation? Well, let me -- let me strike  
16 that. Let me reword it.  
17 **A. Yes.**  
18 Q. Okay. And were you familiar with the  
19 social media policy?  
20 **A. Yes.**  
21 Q. Okay. And were you also familiar with  
22 Southwest's workplace bullying and hazing policy?  
23 **A. Yes.**  
24 Q. Okay. And were you involved in -- or I'm  
25 sorry. Were you familiar with Southwest's sexual

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1 harassment policy?  
2 **A. Yes.**  
3 Q. Okay. And did -- in -- in your time as  
4 labor relations manager, did you deal with of  
5 potential flight attendant violations of those  
6 policies?  
7 **A. Yes.**  
8 Q. Okay. And do you -- so as for the social  
9 media policy, do you remember any flight attendants  
10 who were terminated for violating the social media  
11 policy?  
12 **A. I know that there were flight attendants**  
13 **terminated for violating the social media policy.**  
14 Q. Okay. And while you were a labor  
15 relations manager, how many terminations of -- for  
16 a social media policy violation do you remember?  
17 **A. I -- I don't know without checking the**  
18 **records.**  
19 Q. Okay. And do you know how many complaints  
20 for a social media policy violation Southwest was  
21 getting each year?  
22 **A. I don't know company-wide. For inflight,**  
23 **we had hundreds -- over the course of years, we had**  
24 **hundreds of complaints of violations.**  
25 Q. Okay. And if I do say employees, yes, I

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1 -- I do, generally, mean flight attendants in -- in  
2 -- working in inflight.  
3 Okay. And how -- how -- how did that  
4 change between, say, the time you began as labor  
5 relations -- well, let me -- let me re- -- let me  
6 ask that again.  
7 Did -- did the number of social media  
8 policy violations decline between the time you  
9 began as labor relations manager and when you  
10 retired?  
11 **A. No. When I began as the labor relations**  
12 **manager, I am not sure that we even had any social**  
13 **media complaints yet; we may have. And then the**  
14 **number increased significantly. Southwest and**  
15 **inflight put out quite a bit of communication. And**  
16 **then after that, we did see a decline in the social**  
17 **media complaints. However, they were always --**  
18 **they were always an issue.**  
19 Q. Okay. And -- and what were the  
20 communications you referred to that Southwest put  
21 out about social media policy violations?  
22 **A. There were company-wide communications and**  
23 **there were also inflight read-before-flies, which**  
24 **are the memos that are directed specifically to**  
25 **flight attendants.**

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1 Q. Okay.  
2 **A. And I know that the union also had**  
3 **communication in their Unity Magazine.**  
4 Q. Okay. Did you receive the union's Unity  
5 Magazine?  
6 **A. Occasionally, I received it. I did not**  
7 **receive it regularly because I was no longer a**  
8 **union member.**  
9 Q. Okay. And how did you receive the Unity  
10 Magazine?  
11 **A. The union leaders sent it to me.**  
12 Q. Okay. They -- did they send it to you by  
13 email?  
14 **A. No. I think that they used company board**  
15 **mail and sent me a hard copy.**  
16 Q. And how does the company board mail work?  
17 **A. There is a large manila envelope; and on**  
18 **the front of it, you write the department that it's**  
19 **coming from and the department that it's going to.**  
20 **And then, I guess, the mail department picks it up**  
21 **and carts it around the -- the country sending it**  
22 **to -- to whomever it is addressed.**  
23 Q. Okay. So it's -- it's not electronic?  
24 **A. I think that the -- it's -- when I was**  
25 **receiving them, it was not electronic. I think it**

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1 is now; I don't know.

2 Q. Okay. How long were you receiving copies  
3 of Unity?

4 A. It just was occasional. I -- I don't -- I  
5 never could figure out any rhyme or reason to it.  
6 Just, occasionally, the union would send a hard  
7 copy of the Unity Magazine to me.

8 Q. Okay. Do you remember if you were getting  
9 it up until the time you retired?

10 A. I don't think I received any copies in the  
11 last few years that I was there.

12 Q. Okay. Now, you mentioned company-wide  
13 memos on -- regarding social media policy  
14 violations. Do you recall when the company issued  
15 those?

16 A. No.

17 Q. Okay. Do you -- do you remember if they  
18 were sent frequently?

19 A. I -- I do not. They were not sent  
20 frequently, that I remember. I think that it was  
21 mainly when the social media violation policy was  
22 implemented and then any time that it was updated.  
23 Also, the -- each employee was required annually to  
24 acknowledge that they read and agreed to abide by  
25 the social media policy.

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1 Q. Okay. And who prepared the  
2 read-before-fly memos?

3 A. It could be a different -- authored by  
4 many different people. And then published by the  
5 communications team.

6 Q. Okay. When the social media policy  
7 violations escalated, do you know who authored  
8 those read-before-fly memos?

9 A. I -- I don't know off the top of my head.  
10 I believe that there was communication from Mike  
11 Mankin, Mike Hafner and Sonya Lacore.

12 Q. Okay. Do you know -- go ahead. Oh, I am  
13 sorry. Do you know when they issued those  
14 read-before-fly memos?

15 A. Not without seeing them, no.

16 Q. Okay. All right. Now, did the -- did the  
17 social media policy violations decline the year  
18 prior to your retirement?

19 A. I don't know without looking at specific  
20 numbers.

21 Q. Okay. All right. Okay.

22 MR. GILLIAM: Can we maybe go off  
23 record for just a second?

24 MR. CORRELL: Sure.

25 MR. GILLIAM: Would it be possible

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1 to --

2 THE REPORTER: Mack --

3 MR. GILLIAM: -- send you --

4 THE REPORTER: Hold on real quick.

5 THE VIDEOGRAPHER: Just a second. We  
6 are off record at 9:49 a.m.

7 (Recess taken.)

8 THE VIDEOGRAPHER: We are back on  
9 record at 10:00 a.m.

10 Q. (By Mr. Gilliam) Okay. Ms. Emlet, I  
11 think, in your testimony, didn't you mention that  
12 you recalled the company issuing some  
13 read-before-fly memos about social media policy  
14 violations?

15 A. Yes.

16 Q. Okay. But you did not recall the -- the  
17 -- the date that -- dates that those were issued?

18 A. That's correct.

19 Q. Okay. Do you recall giving testimony in  
20 the arbitration of Ms. Carter's grievance against  
21 the company for her termination?

22 A. Yes.

23 Q. Okay. If I could refer you to the  
24 document that you were just emailed.

25 A. Yes.

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1 Q. And if you want to look at -- I guess, I  
2 direct you to Page 447. That's where the start of  
3 your testimony would be. That's 447 of the  
4 arbitration. It might not be the page number of  
5 your PDF.

6 A. Okay.

7 MR. CORRELL: Ms. Emlet, it will be  
8 Page 129 of your PDF.

9 THE WITNESS: Okay.

10 Q. (By Mr. Gilliam) And I would represent  
11 that that's your arbitration testimony.

12 A. Yes.

13 Q. And then my question will be about Page  
14 450, Lines 16 and 17.

15 A. Okay. Could you tell me where I am  
16 looking? I am on my testimony now. And what --  
17 what am I looking at; page what?

18 Q. It actually -- of your PDF, it might be --  
19 what -- 132, it's --

20 A. Okay.

21 Q. -- it's 450 of the arbitration.

22 A. Okay. I have got it.

23 Q. And then, I guess, between Lines 8 and 17  
24 of the transcript.

25 A. Yes.



1 Q. Does reading that help refresh your  
2 recollection as far as when you -- when the  
3 read-before-fly memos were issued?

4 **A. It -- that February of 2017 would have**  
5 **been one of the read-before-flies that was issued.**

6 Q. Okay. Do you remember if another  
7 read-before-fly memo was issued before that?

8 **A. Well, according to this testimony, it**  
9 **looks like there was one in 2016 as well.**

10 Q. Okay. Do you know why the read-before-fly  
11 memo was issued in February of 2017 after one had  
12 been issued in 2016?

13 **A. Because we were continuing to see an**  
14 **increase in the social media violations among**  
15 **flight attendants. And so the leadership decided**  
16 **-- determined that it was necessary to give the**  
17 **flight attendants a reminder.**

18 Q. Do you know when they made that  
19 determination?

20 **A. No.**

21 Q. Okay. Do you know how long it takes to  
22 issue a read-before-fly memo?

23 **A. Well, it can be issued almost**  
24 **instantaneously, but the question, I imagine, is**  
25 **how long it takes to be written. If it's already**

1 issued?

2 **A. No.**

3 Q. Okay. Now, based off of the dates that  
4 you have testified to for the read-before-fly memo,  
5 do you know if the social media policy violations  
6 had declined by 2018?

7 **A. I can't tell you whether they did or not**  
8 **without seeing actual numbers. I think that they**  
9 **-- we did see a decline in social media violations.**  
10 **And then I think there was another upswing, and**  
11 **then they went down again.**

12 Q. And the -- the upswing you just mentioned,  
13 was that after the read-before-fly memo was issued?

14 MR. CORRELL: Objection. Vague.

15 Q. (By Mr. Gilliam) Let me ask it again.  
16 The upswing that you saw, was that after the  
17 February 2017 read-before memo?

18 **A. I can't tell you for certain. My**  
19 **recollection is that the social media policy**  
20 **violations started out with a steady increase; they**  
21 **got very high. After the 2017 memo, they went**  
22 **down. Then we saw a slight uptick again, and then**  
23 **they -- so it was kind of a roller coaster, but I**  
24 **-- I believe, without actually looking at specific**  
25 **numbers, that prior to February of '17, we had more**

1 **written, you can publish it in a matter of minutes.**

2 Q. Okay. And -- and you don't know how long  
3 it took to -- for Southwest to prepare that memo?

4 **A. No. I was not involved in that.**

5 Q. Okay. And do you know if the 2017 memo  
6 came from Mike Hafner or Sonya Lacore?

7 **A. I don't remember which -- who -- who**  
8 **issued it.**

9 Q. Okay. And in -- I guess, in -- between  
10 2016 and 2017, with those read-before-fly memos  
11 issued at that time, do you recall that there were  
12 more social media policy violations during those  
13 two years?

14 MR. CORRELL: Objection. Asked and  
15 answered.

16 **A. My recollection is that there were more**  
17 **social media violations before the February of 2017**  
18 **memo was issued.**

19 Q. (By Mr. Gilliam) Okay. And do you -- do  
20 you know during those years about how many social  
21 media policy violation complaints you were seeing?

22 **A. No.**

23 Q. Okay. Do you know how many social media  
24 policy violations -- violation complaints you were  
25 getting after the 2017 read-before-fly memo was

1 **social media violations in inflight.**

2 Q. Okay. Now, apart from the social media  
3 policy, were you involved in cases where there was  
4 an alleged violation of the workplace bullying and  
5 hazing policy?

6 **A. Yes.**

7 Q. Okay. And did -- I -- I guess, what --  
8 what specific role did you have in investigations  
9 of violations of the workplace bullying and hazing  
10 policy?

11 **A. Well, the investigation actually would**  
12 **take place at the base level wherever the accused**  
13 **flight attendant was based. And then my role would**  
14 **be to review the information that the base gathered**  
15 **and determine whether or not a violation had**  
16 **occurred; and to make sure that any potential**  
17 **discipline was being applied consistently across**  
18 **the department and across the company.**

19 Q. Okay. And in reviewing whether a  
20 violation had -- had occurred, would you make your  
21 own determination separate from the human resources  
22 business partner?

23 **A. No. They really were our liaisons because**  
24 **they oversaw that policy.**

25 Q. Okay. And would the human resources

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1 business partner make the ultimate determination  
2 whether there was a violation of the bullying and  
3 hazing policy?

4 **A. I -- I am not sure that I can say that**  
5 **they made that determination. It's been a long**  
6 **time since I have been at work. So my recollection**  
7 **is that they -- they would advise the base on**  
8 **whether or not there had been a violation of the**  
9 **policy. There -- but they did not consult on**  
10 **discipline or how to proceed with the particular**  
11 **employee.**

12 Q. Okay. And where would your, I guess,  
13 determination of whether there had been a violation  
14 of the bullying and hazing policy fit into the -- I  
15 guess, the -- the -- the analysis?

16 **A. Well, it -- it was never a stand-alone --**  
17 **it was -- it was more of a consensus. I think that**  
18 **the base leader used all of their resources, spoke**  
19 **with the experts in the different areas.**  
20 **Ultimately, it would be up to the human resources**  
21 **business partner to tell us whether or not they**  
22 **believed there was a violation of the policy. And**  
23 **then if the base determined that discipline was**  
24 **warranted, I would work with them to ensure**  
25 **consistency in applying discipline.**

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1 Q. Okay. And before, I guess, applying any  
2 discipline and determining whether a violation had  
3 occurred, would you communicate your conclusions  
4 directly to the human resources business partner or  
5 to the base manager?

6 **A. I did not, generally, work with the human**  
7 **resources business partner; the base manager would**  
8 **have worked with that person. And I would work**  
9 **with the base manager.**

10 Q. Okay. All right. And, I guess, during --  
11 during your work as a labor relations manager, how  
12 many violations of the workplace bullying and  
13 hazing policy were there?

14 **A. I don't know.**

15 Q. Were -- were there very many?

16 **A. I -- I -- I think that is a subjective**  
17 **question. I -- I don't know how many there were.**  
18 **I -- I can't even guess.**

19 Q. Okay.

20 **A. I think that there -- I know that there**  
21 **were multiple, but I -- I can't tell you how many.**

22 Q. Okay. Do you remember if anyone was ever  
23 terminated for a workplace bullying and hazing  
24 policy violation?

25 **A. I don't remember definitively. I believe**

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1 **that there were terminations for workplace bullying**  
2 **and hazing.**

3 Q. Okay. Now, with the sexual harassment  
4 policy, was your role similar to the one you had  
5 with the workplace bullying and hazing policy in  
6 that you would review whether a violation had  
7 occurred and then get involved in the assessment of  
8 the consistency of the discipline?

9 **A. Yes. The only difference is that with**  
10 **sexual harassment, the -- the base would engage the**  
11 **employee relations team.**

12 Q. Okay. And, again, during your time as a  
13 labor relations manager, were -- were there any  
14 terminations for sexual harassment policy  
15 violation?

16 **A. Yes.**

17 Q. Okay. And which ones do you recall, if  
18 any?

19 **A. I don't -- I don't remember specific**  
20 **names, but I do know that there were terminations**  
21 **for sexual harassment policy violations.**

22 Q. Okay. Do you remember if there were more  
23 than five?

24 **A. I don't know. I -- I think there were**  
25 **more than five, but I don't know for sure.**

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1 Q. Okay. Now, did -- did you keep records of  
2 some of the other discipline that was issued under  
3 these policies?

4 **A. While I was employed with Southwest**  
5 **Airlines, there -- we had archives of previous**  
6 **cases.**

7 Q. Okay. And did you archive those cases in  
8 the ProLaw database?

9 **A. Yes.**

10 Q. Okay. And were those records also kept at  
11 the base as well?

12 **A. I don't know.**

13 Q. Okay. And is -- is that what -- would you  
14 rely on those records for purposes of making sure  
15 that discipline was consistent?

16 **A. Yes.**

17 Q. Okay. What other resources did you  
18 utilize to make sure that the discipline that was  
19 being issued was consistent?

20 **A. If it was a company viol- -- company**  
21 **policy violation, we would consult with -- for**  
22 **instance, in the hazing and bullying, we would**  
23 **consult with the HR VP. If it was any kind of**  
24 **harassment, we would consult with employee**  
25 **relations. And then, also, if -- if inflight did**

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1 not have any experience in those allegations or  
2 violations, we would consult with the other  
3 departments throughout the company to ensure that  
4 the company's discipline was consistent.

5 Q. Okay. Now, what -- I guess, what  
6 interactions did the labor relations department  
7 have with Local 556?

8 MR. CORRELL: Objection. Calls for  
9 speculation.

10 Q. (By Mr. Gilliam) Well, let me ask it this  
11 way: So what -- what interactions did you have as  
12 labor relations manager with Local 556?

13 A. I spoke with different union leaders  
14 almost on a daily basis. We would discuss open  
15 cases or if they were looking for settlement on  
16 different things or clarification on how -- how  
17 policies or contractual language was being applied.  
18 Also, we -- the labor relations team met with the  
19 Local 556 leadership on a monthly basis to discuss  
20 open grievances and the possibility of reaching  
21 settlements on some of those cases.

22 Q. Okay. And did -- did -- did labor  
23 relations talk -- well, let me -- let's see.

24 MR. GILLIAM: Need to take a quick  
25 five-minute break, if I could?

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1 MR. CORRELL: Sure.

2 MR. GILLIAM: I will be right back.

3 THE VIDEOGRAPHER: We are off record  
4 at 10:19 a.m.

5 (Recess taken.)

6 THE VIDEOGRAPHER: We are back on  
7 record at 10:30 a.m.

8 Q. (By Mr. Gilliam) All right. Ms. Emlet,  
9 was there a collective bargaining agreement in  
10 effect between the union and the company when you  
11 retired from Southwest?

12 A. Yes.

13 Q. Do you know how long it had been in  
14 effect?

15 A. I don't remember when the -- the last  
16 contract was ratified.

17 Q. Okay. Do you remember how long --  
18 roughly, how long it -- well, no. Let me ask it  
19 another way.

20 Were there -- while you were labor  
21 relations manager, were -- were there negotiations  
22 regarding the contract that were ongoing between  
23 Southwest --

24 A. Yes.

25 Q. -- and the company -- I am sorry,

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1 Southwest and the union?

2 A. Yes.

3 Q. Okay. And was there ever a time between  
4 when you started as labor relations manager and  
5 when you retired, that, I guess, the company and  
6 the union reached a tentative agreement?

7 A. Yes.

8 Q. Okay. Do you recall, roughly, how long  
9 before your retirement that was?

10 A. Well, there were multiple contract  
11 negotiations during my time with Southwest  
12 Airlines, so I -- I don't remember -- I just don't  
13 remember when the last CBA -- the one that is  
14 currently in effect, I don't remember what year it  
15 was ratified. But then when I -- at the time I  
16 retired from Southwest Airlines, that contract had  
17 become amendable and there were ongoing  
18 negotiations with the union and the company.

19 Q. Okay. And, I guess, can you say how long  
20 negotiations had been going on prior to you  
21 retiring?

22 A. For the current CBA, I think that the  
23 negotiations began in maybe November of 2018.

24 Q. Okay. All right. And can you say, before  
25 that, how long the prior contract had been

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1 amendable?

2 A. I don't know. I think it became amendable  
3 in May of 2018, but I don't have the CBA in front  
4 of me, so I don't know the exact date.

5 Q. Okay. Can -- well, were you involved in  
6 contract negotiations at all?

7 A. No, no.

8 Q. Okay. And your labor relations department  
9 wasn't involved in contract negotiations?

10 A. One person from our team was involved in  
11 the contract negotiations, but I was not.

12 MR. CORRELL: And before we proceed,  
13 Ms. Emlet, I am going to advise you that my  
14 understanding is that the 556 contract is  
15 negotiated that team -- the team that negotiates  
16 the 556 contract includes counsel. As a result,  
17 please do not testify about communications you had  
18 about the negotiations with members of the  
19 negotiating team, and do not testify about  
20 information you supplied to the negotiating team to  
21 the extent you did supply information to them.

22 Q. (By Mr. Gilliam) Now, shifting gears a  
23 little bit, is it correct that you -- you did have  
24 meetings with the union regarding the application  
25 of the CBA?

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1 A. Yes.

2 Q. Okay. Did the union ever raise concerns  
3 with you about the application of social media  
4 policies?

5 A. As I recall, the union was on the same  
6 page as the company regarding social media  
7 violations. I don't -- I don't remember any  
8 conversations that you are referencing.

9 Q. Okay. And when you say that the union was  
10 on the same page as the company regarding social  
11 media violations, what do you mean?

12 A. They agreed that there was a problem in  
13 the company with the misuse of social media.

14 Q. Okay. And what misuse of social media did  
15 they -- did the union convey to you was occurring?

16 A. I don't think that there is anything I can  
17 -- I don't think I can answer that question. There  
18 is nothing specific that I know of that they  
19 conveyed to me.

20 Q. Okay. So in your -- your work -- I guess,  
21 within the labor relations department, did -- did  
22 you -- did you learn that the union had expressed  
23 concerns about inconsistencies in how the social  
24 media policy was being applied?

25 A. They may have expressed that. They -- I

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1 media policies?

2 A. I don't know if they brought forward  
3 concerns or -- or requests to make changes to the  
4 social media policy or the enforcement of it. They  
5 frequently discussed things that they would like to  
6 see changed, but I -- I can't tell you just from  
7 memory what those -- what those topics were.

8 Q. Okay. Now, in your -- your -- your  
9 meetings with the union about work policies, did  
10 you discuss either the workplace bullying and  
11 hazing policy or the sexual harassment policy?

12 A. I know that we had discussions about the  
13 sexual harassment policy. I don't remember whether  
14 or not we ever discussed the workplace bullying or  
15 hazing policy.

16 Q. And what discussions did you have about  
17 the sexual harassment policy?

18 A. I -- I don't know. I have no idea.  
19 Probably -- it -- it -- it most likely was related  
20 to a specific case, but I -- I can't tell you what  
21 the discussions were.

22 Q. Okay. All right. Again, shifting gears,  
23 you -- you know that Southwest terminated Charlene  
24 Carter's employment, correct?

25 A. Yes.

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1 know that they were concerned about any  
2 inconsistencies that they believed they saw with  
3 any policy or work rule. So we -- we had lots of  
4 conversations over the years about whether or not  
5 things were being applied consistently.

6 Q. Okay. And who did you have those  
7 conversations with?

8 A. Well, they would have most likely been at  
9 our monthly grievance meetings with the grievance  
10 chairs or with the -- the union president usually  
11 attended those meetings as well.

12 Q. Okay. Do you remember, in any of those  
13 meetings, the union president or the -- the  
14 grievance committee expressing those concerns?

15 A. I don't remember.

16 Q. Okay. Now, apart from inconsistencies,  
17 did -- in any of those meetings, did anyone ever  
18 express a concern about the company applying the  
19 policies in a way that violate or interfere with  
20 flight attendants' rights?

21 A. I don't remember those conversations at  
22 all.

23 Q. Okay. Did -- did the union, in those  
24 meetings, bring to your attention any changes they  
25 wanted to see with the enforcement of the social

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1 Q. Do you recall which policies she was  
2 terminated for?

3 A. Without looking at the termination letter,  
4 I don't know for sure. I know that there were  
5 multiple violations.

6 Q. Okay. If I could direct your attention to  
7 Document 7.

8 MR. GILLIAM: And for anyone else,  
9 it's Exhibit 2.

10 Q. (By Mr. Gilliam) And when you have it,  
11 Feel free to read it over and let me know when you  
12 are ready.

13 A. I -- I don't see -- on my email  
14 attachments, I don't see a Document 7. Do you know  
15 what I'm -- what am I looking for?

16 MR. CORRELL: Ms. Emlet, it will be in  
17 the email I sent you this morning labeled  
18 Deposition Documents 2 of 5.

19 THE WITNESS: Okay.

20 MR. CORRELL: Open that up; there will  
21 be a bunch of PDFs attached to it. One of them is  
22 labeled 7doc.PDF.

23 THE WITNESS: Is it the termination  
24 letter?

25 MR. CORRELL: Yes, ma'am.



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1 THE WITNESS: Okay. That's -- that's  
2 already open on mine.  
3 **A. Okay. I have it.**  
4 Q. (By Mr. Gilliam) Okay. And so I take it  
5 you recognize the document?  
6 **A. Yes.**  
7 Q. And does this help refresh your memory as  
8 far as which -- which policy she was terminated for  
9 -- for violating?  
10 **A. Yes.**  
11 Q. Okay. And in the letter, it says that the  
12 -- let's see. I have determined that your conduct  
13 is in direct violation of the Southwest Airlines  
14 mission statement and the following company  
15 policies/rules, including, but not limited to:  
16 workplace bullying and hazing policy and social  
17 media policy.  
18 Do -- I guess, a question I have is:  
19 Do you ever assist in the drafting of termination  
20 letters?  
21 **A. No.**  
22 Q. Okay. Okay. All right. And do you  
23 recall -- I -- I guess, do -- do you recall  
24 specifically what conduct Ms. Carter was --  
25 violated -- or excuse me -- was -- was terminated

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1 for by Southwest?  
2 **A. Apart from what it says in the letter?**  
3 Q. Yes. Well --  
4 **A. Yes, I do.**  
5 Q. Okay. And you recall that she was fired  
6 for Facebook pictures and posts?  
7 **A. Yes.**  
8 Q. Okay. And do -- I guess, did you -- when  
9 did you first hear that a flight attendant had  
10 complained about Ms. Carter's Facebook pictures and  
11 posts?  
12 **A. I don't know what the date was, but I know**  
13 **that -- I -- and I don't remember if it was before**  
14 **or after the fact-finding meeting. I think that**  
15 **prior to the fact-finding meeting, I was given the**  
16 **Facebook posts, the pictures and the videos to**  
17 **review.**  
18 Q. Okay. All right. And who -- who would  
19 have provided those to you to review?  
20 **A. I believe that the labor relations**  
21 **specialist gave them to me.**  
22 Q. And who -- who would the labor relations  
23 specialist have been?  
24 **A. It would have either been Michelle or Sue**  
25 **Ann.**

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1 Q. Okay. What is Michelle's last name?  
2 **A. I knew you were going ask me that. I am**  
3 **-- I am sitting here -- I have only known her for,**  
4 **like, 15 years. I -- I don't know. Sue Ann's last**  
5 **name is Chaffin, C-h-a-f-f-i-n. And Michelle's**  
6 **name will come to me; I have to think about that.**  
7 Q. Okay.  
8 **A. I can look it up, but I don't know off the**  
9 **top of my head.**  
10 Q. Do you know if Charlene Carter's base  
11 manager would have contacted you?  
12 **A. Well, yes. She -- the base manager would**  
13 **have contacted me at some point during that**  
14 **investigation. And Michelle's last name is Lusk,**  
15 **L-u-s-k.**  
16 Q. Okay. All right. Let's see. If I could  
17 direct you to Document 2. And I will give you a  
18 specific page number when you are ready.  
19 **A. Is -- is this the -- it looks like an**  
20 **email thread; is that --**  
21 Q. Yes.  
22 **A. -- Document 2? Okay.**  
23 Q. Yes, ma'am.  
24 **A. I am ready.**  
25 Q. Okay. If you could find the -- the number

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1 at the bottom SWA005682, so Document 5682.  
2 **A. Almost there. Are these in numerical**  
3 **order?**  
4 Q. No, they're -- they're not. Not exactly.  
5 **A. Okay. So --**  
6 Q. It's maybe in the first third.  
7 **A. Okay.**  
8 Q. Maybe not; I have got a bigger stack of  
9 documents here.  
10 **A. Okay. I have it.**  
11 Q. Okay. And then the -- the second email  
12 down -- well, I guess, the first two emails.  
13 **A. Okay.**  
14 Q. Those. Do you recognize those?  
15 **A. Yes.**  
16 Q. Okay. And what are they?  
17 **A. Well, it looks like email communication**  
18 **between me and my leaders. And then there is an**  
19 **email from Ed Schneider, who was the base manager**  
20 **-- Charlene's base manager.**  
21 Q. Okay. And is it -- is it correct that  
22 Denise Gutierrez forwarded the information to you?  
23 **A. I don't remember who sent me what. I know**  
24 **that Denise and I did work together on these --**  
25 **these -- this case. It's possible that Denise was**

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1 the one who sent me the documents, but I got some  
2 from the -- the labor relations specialist, and  
3 then I think that I received others from Denise  
4 Gutierrez.

5 Q. Okay. And who is Denise Gutierrez?

6 A. She -- I am not -- I am not sure what her  
7 exact title is, but she works in the employee  
8 relations department. I am not sure if she is  
9 called a specialist or -- I don't know what -- what  
10 the title of her position is, but she deals with  
11 the investigations of harassment and policy.

12 Q. Okay. When the labor relations specialist  
13 sent you, I guess, the -- the complaint, did -- did  
14 they have any communications with you apart from  
15 email?

16 A. Not that I remember.

17 Q. Okay. And did they send you -- and you  
18 may have said, but I am not entirely sure if I  
19 heard. Did they send you the actual Facebook posts  
20 and pictures that were involved?

21 A. I -- I thought that it was the labor  
22 relations specialists, but I don't really remember  
23 who sent what to me.

24 Q. Okay. But you -- you -- you did have that  
25 information by February 24th, 2017, correct?

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1 then waited for the base leader to contact me to  
2 discuss his investigation.

3 Q. Okay. And what did you do as part of your  
4 review of the information?

5 A. I looked at all of the Facebook posts. I  
6 reviewed the videos. I went to Facebook myself to  
7 see if I could access the pictures just to verify  
8 that they -- they were, in fact -- that they came  
9 from the source that they were purported to have  
10 come from.

11 Q. Okay. And were you able to access the --  
12 the pictures?

13 A. Yes.

14 Q. Okay. And did -- did you, I guess, take  
15 screenshots or try to -- I guess, save that  
16 information?

17 A. I probably did, but I would have to check  
18 the -- well, I don't have access to any of the  
19 company documents anymore.

20 Q. Okay. And, I guess, as part of your  
21 review, did you start comparing these Facebook  
22 posts to any other disciplinary cases you had had  
23 involving the social media policies?

24 A. Yes. That would have been part of my  
25 review.

Page 54

1 A. Yes.

2 Q. Okay. So when you received it, why did  
3 you forward it on to Tammy Shaffer and Brianna  
4 Grant?

5 A. This were my direct leaders. And I had  
6 never seen a case like this, and so I wanted to be  
7 sure that they were looped in. Also, Tammy Shaffer  
8 had requested that she be copied on any social --  
9 any allegations of social media violation.

10 Q. Okay. And why did she ask that?

11 MR. CORRELL: Objection. Calls for  
12 speculation.

13 Q. (By Mr. Gilliam) Did -- did Tammy Shaffer  
14 tell you why she had requested that?

15 A. No.

16 Q. Okay. Okay. Did anyone tell you why  
17 Tammy Shaffer was requesting that?

18 A. No.

19 Q. Okay. And did -- in forwarding it to  
20 them, did -- did you expect them to take any action  
21 on it?

22 A. No.

23 Q. Okay. So once you had received the  
24 information, what -- what did you do with it?

25 A. I reviewed all of the information. And

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1 Q. Okay. And what other, I guess, social  
2 media policy cases did you review?

3 A. Well, I would have reviewed any cases that  
4 we had saved in our ProLaw files that resulted in  
5 suspension or termination. General -- well, they  
6 could have been lesser disciplines, but, generally,  
7 I was only involved in cases that -- that could  
8 result in 30-day suspension or a termination.

9 Q. Okay. And were you only contacted when a  
10 termination or suspension would -- would be  
11 involved?

12 A. Occasionally, I was contacted by the base  
13 on lesser offenses. Or they may -- the base may  
14 have thought that this was a terminable offense;  
15 and after discussion and review of -- of prior  
16 cases, it may -- they may have made a decision to  
17 issue a lower discipline. So it would be a rare  
18 case that I was contacted for something less than  
19 the termination or the 30-day suspension.

20 Q. Now, when you were contacted, were -- were  
21 you told that this would be a case involving either  
22 suspension or termination?

23 A. No. No determination had been made at the  
24 time that I was first contacted.

25 Q. Okay. And after sending this email to

Page 57

1 Tammy and Brianna, did you have any communications  
2 with them about the post?

3 **A. Probably, but I don't remember.**

4 Q. Okay. And I think you mentioned that they  
5 were your leaders. What -- what was Tammy  
6 Shaffer's job title?

7 **A. She was the director of inflight labor**  
8 **relations. And Brianna was the senior manager of**  
9 **inflight labor relations.**

10 Q. Okay. And did the director report to the  
11 senior manager?

12 **A. No. The other way around.**

13 Q. Senior manager reports to the director.  
14 Okay.

15 **A. Right.**

16 Q. All right. So was Brianna your direct  
17 supervisor?

18 **A. Yes.**

19 Q. Okay. And Tammy was Brianna's direct  
20 supervisor?

21 **A. That's correct.**

22 Q. Okay. And who did Tammy Shaffer report  
23 to?

24 **A. Actually, I don't remember, especially at**  
25 **that date because there was a lot of -- of**

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1 Q. Okay. Do you know if she was director for  
2 inflight labor relations when you became labor  
3 relations manager?

4 **A. She was not.**

5 Q. Okay. All right. And Brianna Grant, was  
6 she senior manager of inflight labor relations when  
7 you became labor relations manager?

8 **A. No.**

9 Q. Okay. And do -- do you recall if both had  
10 been there, at least in -- in their respective  
11 positions, about several months?

12 **A. At the time of the -- February of 2017?**

13 Q. Yes.

14 **A. Brianna had been. I think that -- I -- I**  
15 **don't remember for sure, but I think that Tammy**  
16 **joined labor relations -- inflight labor relations,**  
17 **I thought it was 2016, but I just don't remember**  
18 **for sure.**

19 Q. Okay. Okay. As part of your email here,  
20 you say, I will send you an additional email with  
21 links to videos that were sent to Audrey.

22 And who is Audrey there?

23 **A. Audrey Stone. At the time, she was the**  
24 **president of TWU 556.**

25 Q. Okay. Do you know, as part of this

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1 **reshuffling, organizational changes. So I -- I --**  
2 **I actually don't remember who she reported to. I**  
3 **think that she -- when she first joined the**  
4 **inflight team, she reported to Naomi Hudson. And**  
5 **then I think that Kevin Minchey became her -- her**  
6 **leader.**

7 Q. And do you remember the job title that she  
8 reported to?

9 **A. Well, when it was Naomi Hudson, she was**  
10 **the senior director of inflight labor relations.**  
11 **And Kevin Minchey is one of our attorneys.**

12 Q. Okay. And at this time --

13 **A. Actually, I don't even know if it was**  
14 **Kevin that she reported to. I -- I just don't**  
15 **remember.**

16 Q. Okay. And at this time, in February 2017,  
17 do you remember if Tammy had -- Tammy Shaffer had  
18 been director of inflight labor relations for very  
19 long?

20 **A. I do not remember when she joined inflight**  
21 **labor relations. She has been with the company, I**  
22 **think, 35 years; maybe 38 years. And she was the**  
23 **director of -- of labor relations for another**  
24 **department for -- I don't know -- 10 or 15 years**  
25 **prior to taking on inflight.**

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1 investigation, if you received Audrey's initial  
2 complaint?

3 **A. I wasn't the first one to receive it, but**  
4 **I -- I am sure I reviewed it during the course of**  
5 **the investigation.**

6 Q. Okay. Let's see. If I could refer you to  
7 Document 1.

8 **A. Okay.**

9 Q. And if you could just read -- I guess,  
10 review the whole thing -- read and review the whole  
11 thing.

12 **A. Okay.**

13 Q. And do you recognize this?

14 **A. Yes.**

15 Q. And what is it?

16 **A. This is an email that Suzanne Stephensen**  
17 **received. It -- it looks like it was originally**  
18 **sent on February 22nd of 2017 from Audrey Stone to**  
19 **Suzanne Stephensen.**

20 Q. Okay. And the -- the screenshots that are  
21 a part of this exhibit, do -- were -- were these  
22 the screenshots that were at issue in this  
23 complaint?

24 **A. These are some of them, yes.**

25 Q. Okay. The first screenshot that -- well,

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1 let me back up a bit.

2 Do you remember what other screenshots  
3 were involved in Ms. Stone's complaint?

4 **A. Well, I don't know if Ms. Stone sent any**  
5 **other screenshots. I know that there were**  
6 **additional screenshots that were provided during**  
7 **the -- or -- or uncovered during the course of the**  
8 **investigation of these allegations, but I don't**  
9 **know -- I don't know whether or not Audrey provided**  
10 **any other screenshots.**

11 Q. Okay. And do you know who provided the --  
12 the other screenshots?

13 **A. I don't remember. Some of them, I**  
14 **believe, I found on Ms. Carter's Facebook page.**  
15 **And then -- I -- I don't remember where else they**  
16 **would have come from, but it would have been from**  
17 **company leaders who were working on the**  
18 **investigation, I believe.**

19 Q. Okay. Do you remember what screenshots  
20 you found on -- on -- on Ms. Carter's website that  
21 were connected to her termination?

22 **A. I don't know for sure which screenshots I**  
23 **found or if someone else provided them. I know**  
24 **that there were screenshots of Ms. Carter in her**  
25 **Southwest uniform or on -- on a Southwest airplane,**

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1 Q. Okay. All right. Do you know when the, I  
2 guess, issues with the recall started to -- well, I  
3 guess, crop up?

4 **A. I don't know. It was prior to this time.**  
5 **I don't know how long they had been going on.**

6 Q. Okay. Were there issues with the recall  
7 when you retired?

8 **A. No.**

9 Q. Okay. Do you know when those -- the  
10 issues about the -- the recall, I guess, subsided?

11 **A. I think when the new union president was**  
12 **voted into office.**

13 Q. Okay. Do you know when that was?

14 **A. I think it was January -- well, actually,**  
15 **I don't know. I think it was the beginning of**  
16 **2019, but I don't -- I don't remember for sure.**

17 Q. Okay.

18 **A. Might have been October of '18.**

19 Q. Okay. All right. And, I guess, turning  
20 back to Document 2. Well, I'll probably ask you a  
21 question before we get there. Do you know if Ed  
22 Schneider eventually contacted you about the  
23 investigation?

24 **A. Yes.**

25 Q. Okay. And what -- when -- when he

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1 **and those were provided as a nexus to the**  
2 **workplace.**

3 Q. Okay. All right. And, I guess, turning  
4 back to the Page 4228 in that first screenshot.

5 **A. Are we going back to the last document?**

6 Q. Yes, ma'am. Document 1. So --

7 **A. We're still in Document 1?**

8 Q. Yes, ma'am. Yeah.

9 **A. Okay.**

10 Q. And 4228. It should be the first  
11 screenshot.

12 **A. Okay.**

13 Q. And the -- the message -- part of the  
14 message says, you truly are despicable in so many  
15 ways. By the way, the recall is going to happen.

16 What is the recall?

17 **A. If I remember correctly, there was a**  
18 **faction of 556 members who wanted to remove Audrey**  
19 **Stone from office.**

20 Q. Okay. And how did you learn about the  
21 recall?

22 **A. Well, it was common knowledge because**  
23 **flight attendants were very vocal about it. So I**  
24 **don't know how I learned about it; probably from**  
25 **other Facebook posts.**

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1 contacted you, what did he -- I guess, what did he  
2 say to you?

3 **A. Well, I don't know what the actual**  
4 **conversation was; that was three years ago. But he**  
5 **-- he relayed the specifics of the case to me. And**  
6 **he would have asked me, you know, what I had seen;**  
7 **what other -- what other cases of social media or**  
8 **bullying or hazing, sexual harassment cases. We**  
9 **would have discussed what the -- what prior cases**  
10 **we had seen. And then, ultimately, he would have**  
11 **told me what his decision was in -- in the**  
12 **discipline of the case.**

13 Q. Okay. Would you have discussed the, I  
14 guess, other -- the other cases that you were using  
15 as a comparison before the fact-finding?

16 **A. No.**

17 Q. Okay. So you would have had that  
18 discussion after the fact-finding?

19 **A. Yes.**

20 Q. Okay. Did -- do you know if you would  
21 have had any conversations with Ed Schneider about  
22 the -- the merits of the case before the  
23 fact-finding?

24 **A. I would not.**

25 Q. Okay. Do you recall if you had any



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1 conversations with -- any communications with Ed  
2 Schneider about other -- other  
3 information-gathering he was conducting?

4 **A. I -- I don't know in this case, but it was**  
5 **-- it would be common practice for me to -- to**  
6 **direct leaders to different resources in case they**  
7 **had not looked at all of the areas in an**  
8 **investigation. So -- so I might have said, well,**  
9 **did you look at this; did you look at that? But I**  
10 **don't -- I don't remember specific conversations.**

11 Q. And just generally, what -- what are those  
12 resources that you would direct base managers to?

13 **A. It would depend on the case.**

14 Q. Okay. Are there particular resources that  
15 you would direct a base manager to in a social  
16 policy -- social media policy violation case?

17 **A. Well, I would probably ask them to look at**  
18 **the -- the social media site themselves; to make**  
19 **sure that they had reviewed the social media policy**  
20 **to determine whether or not there was actually any**  
21 **violation. And then depending on what the alleged**  
22 **violation was, it could be a violation of another**  
23 **work rule or company policy that was committed via**  
24 **social media. So, for instance, there could be a**  
25 **sexual harassment violation that was completed via**

Page 66

1 **social media.**

2 Q. Okay. And what -- what resources would  
3 you refer a base manager to if they were  
4 investigating a potential violation of the  
5 workplace bullying and hazing policy?

6 **A. The human resources business partner.**

7 Q. Okay. Okay. Is that really the only  
8 resource you would direct them to in the case of a  
9 workplace bullying and hazing violation?

10 **A. Well, I typically would also make sure**  
11 **that they had discussed the case with their direct**  
12 **leader. But if it's specific to the workplace**  
13 **bullying and hazing policy, that -- that's the HR**  
14 **VP that oversaw that.**

15 Q. Okay. Do you know here if -- if -- if  
16 Mr. Schneider had discussed these policy violations  
17 with his direct leader?

18 **A. I believe so, yes.**

19 Q. Okay. Did you talk to his direct leaders  
20 about the policy -- potential policy violations?

21 **A. Probably not. That -- that conversation**  
22 **was typically held between the base leader and**  
23 **their leader.**

24 Q. Okay. Do you know if Ed Schneider ever  
25 told you what his communications were with his

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1 leaders?

2 **A. I don't know.**

3 Q. Okay. All right. And you didn't attend  
4 the fact-finding -- -finding meeting for Charlene  
5 Carter, did you?

6 **A. I did not.**

7 Q. Okay. Do you remember if you received  
8 notes about that fact-finding meeting?

9 **A. I did.**

10 Q. Okay. Let's see. I could direct you to  
11 -- so many papers here. Let's see. It's Exhibit  
12 6, but that's not what you need. Document 9.

13 **A. Okay.**

14 Q. And have you had the chance to review it?

15 **A. Oh, the -- the whole fact-finding notes?**  
16 **I have not reviewed these since the arbitration**  
17 **hearing.**

18 Q. Okay. If you want to take a moment to  
19 review it, go ahead. And when you are ready --

20 **A. Do you want me to read the entire**  
21 **document?**

22 Q. You don't have to read it word for word.  
23 I just wanted you -- I was going to ask you some  
24 questions about it. I didn't know if you wanted  
25 to --

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1 **A. Okay.**

2 Q. -- take a look at -- look at it.

3 **A. All right.**

4 Q. Okay. So you recognize these documents?

5 **A. Yes.**

6 Q. And what are they?

7 **A. These are the fact-finding notes from**  
8 **Ms. Carter's fact-finding meeting with Ed**  
9 **Schneider.**

10 Q. Okay. And at the time, do you recall if  
11 you reviewed the -- the fact-finding -- and when I  
12 say at the time, when -- when Ed sent these to you,  
13 do you know if you reviewed them at some point  
14 after March 9th, 2017?

15 **A. Yes, I did.**

16 Q. Okay. And if I could focus your attention  
17 on the second-to-last paragraph on 4676 and then  
18 continue over to 4677.

19 **A. Okay.**

20 Q. Where Charlene says, I am Christian, I am  
21 a conservative and I am pro-life. This happens to  
22 be a huge issue for me and I get the message out  
23 wherever I can. And this was sent to me and I  
24 decided to post it on my Facebook page. I think it  
25 -- if more and more people would see what actually

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1 happens -- then it continues. And on the second  
2 page, it -- Charlene says, I had an abortion and I  
3 regret every bit of it, so I work with other  
4 pro-life groups. And for me as a Christian, if I  
5 can get the word out in any way to every group as  
6 possible to touch this issue, I do.

7 Do you remember reading -- reading  
8 that?

9 **A. Yes.**

10 Q. Okay. Now, when you read that, did you  
11 consider reporting that to the -- the ACT team?

12 **A. I don't remember whether or not I reported**  
13 **it to the ACT team.**

14 Q. Okay. Did you consider whether a -- an  
15 accommodation should be made based off of that  
16 information?

17 **A. I don't -- I don't -- I don't know what I**  
18 **considered at that time. This doesn't look to me**  
19 **like there is a request for an accommodation.**

20 Q. Okay. All right. Did that information  
21 factor into your -- your evaluation of the case?

22 **A. Did --**

23 MR. CORRELL: Objection. Vague.

24 Q. (By Mr. Gilliam) Did -- did -- I guess,  
25 did -- did that information factor into your

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1 **case. He reviewed everything, recommended**  
2 **termination; and I agreed with his decision.**

3 Q. Okay. At what point did he recommend  
4 termination?

5 **A. I don't know. It was after the**  
6 **fact-finding meeting and after he had reviewed**  
7 **every -- all of the information that he gathered in**  
8 **his investigation.**

9 Q. Okay. So the -- the date of this email is  
10 March 9th, 2017. Based on what -- what you read --  
11 well, strike that.

12 So the date here is March 9th, 2017.

13 And the date of the termin- -- termination letter  
14 is March 14th, 2017. Is it fair to say he made the  
15 -- the determination sometime in that -- in that  
16 period?

17 **A. Yes.**

18 Q. Okay. Now, do you know how soon prior to  
19 sending the termination letter a decision was made  
20 to -- to fire Ms. Carter?

21 MR. CORRELL: Objection. Asked and  
22 answered.

23 **A. I don't know. Typically, the termination**  
24 **letter is sent out very soon after the decision is**  
25 **made. But, of course, we are bound by time frames**

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1 decision as to whether Charlene Carter should be  
2 terminated?

3 **A. Which information are you referring to?**

4 Q. Where -- where she says I'm Christian, I  
5 am a conservative and pro-life? What I read?

6 **A. Not at all.**

7 Q. Okay. Now, going back to the first page,  
8 the 4675.

9 **A. The email?**

10 Q. Yes, ma'am.

11 **A. Yes.**

12 Q. And Ed Schneider has emailed that to you  
13 and Denise, correct?

14 **A. Yes.**

15 Q. Okay. And he -- he says, can we talk  
16 soon?

17 Did -- did you talk to Ed after he  
18 sent you these notes?

19 **A. I am sure that I did.**

20 Q. Okay. And what -- I guess, after reading  
21 these notes and your prior review of the -- the --  
22 the Facebook posts and pictures, what -- what did  
23 you tell Ed?

24 **A. I don't remember what I told him at that**  
25 **time. I know that he -- we -- we discussed the**

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1 **in the collective bargaining agreement. So any**  
2 **decision in termination or issuing of discipline**  
3 **would have to be within those time frames.**

4 Q. (By Mr. Gilliam) Okay. Now, if I could  
5 direct your attention back to Document 2, Exhibit  
6 4. I am sorry. Document 2 for you. And it -- it  
7 would be Page 5762; it's towards the very back.

8 **A. Okay.**

9 Q. And if you could just look at five --  
10 actually, if you could review 5672 (sic) and 5763.

11 **A. I am sorry. Say those numbers again.**

12 Q. 5762 and 5763.

13 **A. Okay.**

14 Q. And do you recognize this?

15 **A. Well, I am not sure I remember it, but I**  
16 **-- I recognize the formatting, yes.**

17 Q. Do you know what it is?

18 **A. Yes.**

19 Q. And what is it?

20 **A. It looks like Ed Schneider sent me a copy**  
21 **of the termination letter. He was asking whether**  
22 **or not the harassment policy should be included.**  
23 **And then I had some questions about whether or not**  
24 **this could be considered sexual harassment. Then**  
25 **under that, the email from Denise is her recap of**

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1 her investigation as to whether or not there were  
2 any harassment policy violations.

3 Q. Okay. And Denise -- Denise's email  
4 preceded your email, correct?

5 A. Yes.

6 Q. Okay. And then Ed responded to you,  
7 correct?

8 A. Yes.

9 Q. And what was Denise's determination as far  
10 as whether there was a sexual harassment policy  
11 violation?

12 A. She says that they do not violate the  
13 company's harassment -- sexual harassment,  
14 discrimination and retaliation. However, the  
15 images of the women -- women dressed as vaginas do  
16 violate the policy.

17 Q. Okay. And then in your response email,  
18 you -- you -- you mention -- you ask, where were  
19 the vagina pictures posted? I haven't seen those.  
20 Wouldn't that make this sexual harassment?

21 Do you know if anybody responded to  
22 your question?

23 A. I don't remember, but I'm -- I'm -- if  
24 they didn't, I would have -- I would have kept  
25 asking until I got an answer. But I don't -- I

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1 record at 11:36 a.m.

2 Q. (By Mr. Gilliam) All right. Ms. Emlet,  
3 before Ed Schneider made his decision to -- to  
4 terminate Ms. Carter, did he provide you with an  
5 investigation report about his investigation?

6 A. I don't think there was anything that  
7 would be classified as an investigation report  
8 specifically. He -- he provided me with the  
9 fact-finding notes and whatever other documentation  
10 he had received or gathered.

11 Q. Okay.

12 A. If that's -- if that's what you mean by  
13 investigation report.

14 Q. Well, did he give you information maybe  
15 summarizing his thoughts on the case prior to  
16 making a decision?

17 A. I don't remember if he sent me anything or  
18 if we had a verbal discussion.

19 Q. Okay. Can I refer you to Document 6, or  
20 Exhibit 7?

21 A. Okay.

22 Q. And if you could just review that. And  
23 once you are ready, let me know.

24 A. Okay.

25 Q. Do you recognize this?

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1 don't remember who -- who responded or -- or what  
2 the response was.

3 Q. I guess Ed's letter does say, do you want  
4 me to add the harassment policy?

5 Do you know if you responded to his  
6 question in that email at the top?

7 A. I don't know, but I -- I probably would  
8 have turned that back on him and said, do you think  
9 there is a violation of the harassment policy? If  
10 so, it needs to be included.

11 Q. Okay. All right.

12 MR. CORRELL: Counsel, when you get to  
13 a good spot, can we take a quick bathroom break?

14 MR. GILLIAM: Yeah, sure. Are we --  
15 is it time for a lunch break or --

16 MR. CORRELL: Probably still too early  
17 because Ms. Emlet is in Mountain time, so it's only  
18 10:30 for her.

19 MR. GILLIAM: Okay. Yeah. Let's --  
20 let's take a bathroom break. Might as well here.

21 MR. CORRELL: Thank you.

22 THE VIDEOGRAPHER: We are off record  
23 at 11:28 a.m.

24 (Recess taken.)

25 THE VIDEOGRAPHER: We are back on

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1 A. I don't remember it, but I -- I recognize  
2 what it would be.

3 Q. Okay. What is it?

4 A. This is an email from Ed Schneider to me,  
5 Denise Gutierrez and Edie -- Edith Barnett, with  
6 Meggan Jones copied on it. And it looks like it's  
7 a recap or a summary of his investigation with  
8 Charlene Carter.

9 Q. Okay. And at the bottom and continuing to  
10 the next page, it says, violations of SWA policies.  
11 Then it mentions social media policy; there is a  
12 paragraph that follows. And the same for bullying  
13 and hazing and harassment policy.

14 A. Yes.

15 Q. And do -- do you remember if he had --  
16 have you talked to -- do you remember if you had  
17 talked to him about the policy -- the specific  
18 policy violations before he sent this email?

19 A. I don't remember the timing of any of  
20 this. So I may have spoken with him, but I don't  
21 remember.

22 Q. Okay. And you don't remember if you would  
23 have spoken to him about this email after he sent  
24 it?

25 A. I probably spoke to him afterward. I

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1 don't know whether or not I spoke to him  
2 beforehand.

3 Q. Okay. And do you know if you agreed with  
4 his assessment of the violations of the policies  
5 there?

6 A. I did agree.

7 MR. CORRELL: Misstates the document.  
8 Ms. Emlet, you can answer.

9 Q. (By Mr. Gilliam) Okay. And do you recall  
10 whether you -- you discussed the -- the termination  
11 decision with Tammy Shaffer or Brianna?

12 A. I don't recall, but that would have been  
13 my usual practice. And especially in a case like  
14 this, I would have -- I -- I would say that I would  
15 have to have discussed it with both of them.

16 Q. Okay. And did you discuss other -- other  
17 cases with them as well?

18 A. I don't know if I discussed specific cases  
19 or gave a broad overview of -- of what some of  
20 those cases were and what the discipline was in  
21 those cases.

22 Q. Okay. Now, in -- in this email, he -- he  
23 says -- second paragraph -- it was then discovered  
24 the longstanding history of Charlene sending  
25 harassing Facebook messages to Audrey.

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1 accusations of what Ms. Carter believed to be  
2 Ms. Stone's beliefs about abortion and, certainly,  
3 I would think that a longstanding history of  
4 harassing Facebook messages could be considered as  
5 hazing or bullying.

6 Q. Okay. And what was the specific violation  
7 that -- that you identified for the social media  
8 policy?

9 A. The -- the videos that she sent to Audrey.  
10 As well as those same videos were on her Facebook  
11 page, which was a public page. And she identified  
12 herself as a Southwest employee.

13 Q. Okay. Do you remember if you found emails  
14 on her Facebook page that identified her as a  
15 Southwest employee?

16 A. I didn't know that there were emails on  
17 Facebook.

18 Q. I am sorry. Do you -- did you find posts  
19 on Ms. Carter's Facebook page that identified her  
20 as a Southwest employee?

21 A. Yes.

22 Q. Okay. Let's see. Well, if I could direct  
23 you to document -- well, first -- can we mark  
24 Document 8 as the next exhibit. I'm not sure which  
25 number we're on.

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1 Was it your conclusion that that was  
2 the specific violation of the harassment and  
3 bullying policy?

4 MR. CORRELL: Objection. Vague.

5 A. I am not sure where you are reading from.  
6 Could you --

7 Q. (By Mr. Gilliam) Sure. Second paragraph,  
8 last sentence.

9 A. Oh, okay. And what was your question?

10 Q. Do you know if -- or did you -- did you  
11 conclude that it was the longstanding history of  
12 Charlene sending the -- the Facebook messages to  
13 Audrey that violated the bullying and hazing  
14 policy?

15 A. I don't remember if that was the case.  
16 But I think that Audrey only brought those Facebook  
17 messages forward after the investigation had  
18 already begun into the messages that included the  
19 abortion videos.

20 Q. Okay. What did you believe the -- the  
21 violation of the workplace bullying and hazing  
22 policy was?

23 A. Well, I don't remember what I thought at  
24 that time. In reviewing it now, I think that --  
25 that the sending of the videos, the accusing -- the

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1 THE REPORTER: Last where I left off  
2 on Monday was Exhibit 13, but --

3 MR. GILLIAM: Was --

4 THE REPORTER: -- I don't know if you  
5 marked anything in Mr. Schneider.

6 MR. GILLIAM: I -- I think I do have  
7 it. I think the next one would be 16.

8 THE REPORTER: Okay.  
9 (Exhibit 16 marked.)

10 Q. (By Mr. Gilliam) Ms. Emlet, this will be  
11 Document 8 for you, if you could review it.

12 A. Okay.

13 Q. And once you've had a chance to review all  
14 of it, let me know.

15 A. Okay.

16 Q. Do you recognize this?

17 A. Yes.

18 Q. And what is it?

19 A. This is an email that I sent to Tammy  
20 Shaffer and Brianna. And it -- it looks like I  
21 have forwarded an email from Denise Gutierrez, and  
22 it has different posts from Facebook.

23 Q. Okay. And it's -- is it also attaching  
24 images?

25 A. Yes.



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1 Q. Okay. Do you know if the images that  
2 follow on Pages 6505 through 6513 were the  
3 attachments to your email?  
4 **A. I think that they were. But looking at**  
5 **this document now, it looks to me like Denise sent**  
6 **them to me and then I forwarded them.**  
7 Q. Okay. All right. But you recognize the  
8 pictures as well?  
9 **A. Yes.**  
10 Q. Okay. And one quick question. On the CC  
11 line, you have inflight labor relations mailbox.  
12 **A. Yes.**  
13 Q. Who receives email there?  
14 **A. Michelle Lusk and Sue Ann Chaffin.**  
15 Q. Okay. Does anyone else receive email from  
16 that box?  
17 **A. Do you mean is anyone on that mailbox?**  
18 Q. Yeah -- yeah. Let me ask the --  
19 **A. Not --**  
20 Q. -- question another -- another way. Does  
21 -- can anyone else access email from that mailbox?  
22 **A. Yes. The -- when I was there, the labor**  
23 **relations team could view emails in that mailbox,**  
24 **but not send anything from it. So this was our**  
25 **repository for the specialists to collect**

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1 **information that needed to then be stored in -- in**  
2 **ProLaw or to respond to union correspondence.**  
3 Q. Okay. I guess, why would you use that --  
4 that mailbox as a repository for responding to  
5 union correspondence?  
6 **A. Well, I didn't, but when the union would**  
7 **email our labor relations team, this is the mailbox**  
8 **that it went into. And then the specialists were**  
9 **mainly responsible for either sorting through that**  
10 **-- the correspondence and forwarding it on to a**  
11 **labor manager, if needed; or responding to the**  
12 **union directly for what they were requesting.**  
13 Q. Okay. And why did you forward these --  
14 these images to Tammy and Brianna?  
15 **A. Because they were my leaders and Tammy had**  
16 **told us that she wanted to be copied on social**  
17 **media investigations.**  
18 Q. Okay. Was it your understanding that she  
19 wanted to be copied on all components for the  
20 social media investigation?  
21 **A. I don't remember. I think that, for**  
22 **lesser -- and it changed over the years also, what**  
23 **she wanted to be involved in and what she didn't.**  
24 **But for more serious cases and when she first came**  
25 **over to the inflight department, she wanted to be**

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1 **involved in all of it.**  
2 Q. Okay. So it was normal that you would  
3 send her all of the information of an -- an  
4 investigation?  
5 **A. Yes.**  
6 Q. Okay. And, now, who made the  
7 determination that there was a nexus between  
8 Ms. Carter's posts and Southwest?  
9 **A. I don't know if any one person made that**  
10 **determination. Typically, in these high-profile**  
11 **cases, our entire labor relations team would**  
12 **discuss the case. And then I -- I know that I had**  
13 **some conversation about the nexus to the workplace**  
14 **and her presenting herself in uniform on -- on her**  
15 **Facebook page.**  
16 Q. Okay. Do you know what the dates of those  
17 pictures were?  
18 **A. No.**  
19 Q. Okay. And I do have a question too about  
20 6505.  
21 **A. Okay.**  
22 Q. And what is the nexus to Southwest on that  
23 page?  
24 **A. Ms. Carter is standing. She's the second**  
25 **one from the right and she has her Southwest**

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1 **Airlines ID around her neck.**  
2 Q. Okay. And I -- I realize that this is  
3 another copy, but can -- can you -- could you read  
4 the -- the version of -- or read that ID in the --  
5 **A. I cannot. Not to my -- my iPad, I can't,**  
6 **no.**  
7 Q. Okay. Do you recall if, on the original  
8 version you saw, you could -- you could read what  
9 was on the ID?  
10 **A. I don't know. I -- I know that -- I don't**  
11 **know if I could read it. I know that the coloring**  
12 **and the layout were definitely recognizable as a**  
13 **Southwest ID.**  
14 Q. Okay. Now, did you have any follow-up  
15 discussions with Tammy Shaffer or Brianna Grant  
16 about any of these pictures?  
17 **A. I am sure I did.**  
18 Q. Okay. Do you know if you talked to them  
19 about whether there was a nexus between Southwest  
20 and the posts?  
21 **A. I probably did, yes.**  
22 Q. Okay. And did they give you any  
23 conclusions about the posts themselves?  
24 **A. I don't remember. I think it would only**  
25 **be that, yes, there was a nexus to the workplace.**

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1 Q. Okay. Would you have told them that you  
2 were -- or would you -- would you have told them  
3 whether you were recommending termination to the  
4 base manager?  
5 **A. I did not recommend the discipline to the**  
6 **base manager. He told me what he was recommending.**  
7 **And then I -- I probably would have had that**  
8 **discussion with Brianna and Tammy to see whether or**  
9 **not our team was in agreement.**  
10 Q. Okay. Do you remember if you had any  
11 communications with Denise Gutierrez about any of  
12 the -- the photos involved in the case?  
13 **A. I know that I talked with her. I don't**  
14 **remember the content of any of those conversations.**  
15 Q. Okay. All right. Now, are -- and do you  
16 recall that -- that -- that Ms. Carter was opposed  
17 to Ms. Stone's participation in the women's march?  
18 **A. Yes.**  
19 Q. Okay. And do you recall why Ms. Carter  
20 was opposed to that?  
21 **A. I don't know for sure. I -- I believe**  
22 **that she was under the impression that Ms. Stone**  
23 **was using union funds to participate in the march.**  
24 **And that by participating in the women's march, she**  
25 **was claiming to be pro-choice.**

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1 Q. Okay. And you recall that -- Ms. Carter  
2 saying that she was opposed to the march because it  
3 was also sponsored by Planned Parenthood?  
4 **A. I don't remember that.**  
5 Q. Okay.  
6 **A. I don't know if she said that.**  
7 Q. And do -- do you remember if she had  
8 shared some information showing that the march was  
9 sponsored by Planned Parenthood?  
10 **A. I don't remember.**  
11 Q. Okay. Have -- are you aware of any  
12 incidents at the company where a -- an employee has  
13 taken a position on Planned Parenthood?  
14 **A. I am not aware of any.**  
15 Q. Okay. Or -- and I -- I may not have  
16 stated this exactly right, but are you aware of any  
17 incidents where a company employee has taken a -- I  
18 guess, a position on Planned Parenthood?  
19 **A. I am not aware of any.**  
20 Q. Okay. If I could -- let's see -- mark  
21 Document 10 as the next exhibit, 17.  
22 (Exhibit 17 marked.)  
23 Q. (By Mr. Gilliam) And, Ms. Emlet, if you  
24 could review Document 10.  
25 **A. I see this.**

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1 Q. Okay. And do you recognize it?  
2 **A. No. I don't know -- I am looking to see**  
3 **if I was ever on this email thread.**  
4 Q. If you could look at the very top --  
5 **A. I am sorry.**  
6 Q. The --  
7 **A. The very top?**  
8 Q. Yeah. Direct your attention to the very  
9 top of 5530.  
10 MR. CORRELL: Though, I would note for  
11 the witness that this packet contains multiple  
12 email threads.  
13 THE WITNESS: Okay.  
14 **A. I do see -- oh, I am CC'd on it. Yeah, I**  
15 **don't remember this at all.**  
16 Q. (By Mr. Gilliam) Okay.  
17 **A. It was directed to Bryan Smith, who, at**  
18 **the time, would have been my colleague. And -- or,**  
19 **actually, it's from him. So I think he must have**  
20 **followed up on this -- this case. I don't -- I --**  
21 **I don't remember it.**  
22 Q. You -- you do see he sent it to you?  
23 **A. Yes.**  
24 Q. Okay.  
25 **A. But I am CC -- yes. But I don't remember**

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1 **-- I don't remember --**  
2 Q. I'm sorry. I said he CC'd you. I guess  
3 he addressed it to you.  
4 **A. Yeah. I don't remember this case at all.**  
5 Q. Okay. And you said Bryan Smith is your  
6 colleague. What's -- what's his position?  
7 **A. Well, at the time of this email, he was a**  
8 **manager of labor relations. He's not anymore.**  
9 Q. Okay. So you were not involved in the --  
10 the issues described here?  
11 **A. I don't remember this case at all, so I**  
12 **don't know if I was involved in it or -- or not.**  
13 Q. Okay. All right. Now, earlier, we were  
14 talking about some of the other social media policy  
15 violations. I can't remember whether you said  
16 whether you recalled any specific social media  
17 policy violation cases you were involved in. Do --  
18 do you recall some of the specific individuals?  
19 **A. Yes.**  
20 Q. Okay. Who -- what -- who were some of the  
21 specific individuals whose cases you -- you recall?  
22 **A. Kent Hand, Brian Talbert, Holly Imamovic,**  
23 **Bill Holcomb. I think -- I don't know. There were**  
24 **-- there were a lot of social media cases.**  
25 Q. Were you involved in any cases involving

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1 Jeanna Jackson?

2 **A. Well, I believe so. I know of Jeanna's**  
3 **history. I don't remember if I was directly**  
4 **involved in any of her investigations or hearings**  
5 **or if I just -- she -- she had multiple violations,**  
6 **so I'm not sure if I was directly involved in any**  
7 **of them.**

8 Q. Okay. Let's see. And what about Ricky  
9 Spand?

10 **A. I know that he had violations. I don't**  
11 **remember whether or not I was the labor manager on**  
12 **any of those cases.**

13 Q. Okay. Were you involved in any  
14 disciplinary investigations involving Casey  
15 Rittner?

16 **A. I believe so, yes.**

17 Q. Okay. Were you involved in any  
18 disciplinary investigations involving Josh  
19 Rosenberg?

20 **A. I don't recognize that name. I might have**  
21 **been, but I don't recognize the name.**

22 Q. Okay. Were you involved in any  
23 disciplinary violations involving Kendall Foss?

24 **A. Yes.**

25 Q. Okay. And do you know -- do you recall

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1 **picture of someone hanging out of the car window**  
2 **with a machine gun and there was some verbiage on**  
3 **-- on the car. I don't remember exactly what it**  
4 **said, but I know that the union -- some of the**  
5 **union representatives felt that it was a direct**  
6 **threat against the union.**

7 Q. Okay. Do you know who reported Mr. Hand?

8 **A. No. It was not reported to me.**

9 Q. Okay. Okay. And what do you recall about  
10 Mr. Talbert's case?

11 **A. Nothing.**

12 Q. Okay.

13 **A. I -- that was -- that was a long time ago.**  
14 **I don't remember any specifics of -- of that case.**

15 Q. You don't remember whether he was  
16 terminated?

17 **A. I do know he was terminated. I don't**  
18 **remember what the violation or violations were. I**  
19 **know it was social media, but I can't -- can't**  
20 **recall any other specifics of the -- that case.**

21 Q. Okay. Do you know if he got his job back  
22 at Southwest after he was terminated?

23 **A. Yes, he did.**

24 Q. Okay. And is he still employed with  
25 Southwest?

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1 what the discipline that was issued to Kendall was?

2 **A. She was terminated.**

3 Q. Okay. And do you know which -- which rule  
4 she was terminated for?

5 **A. I don't remember specifically.**

6 Q. Okay. Do you know if it was a social  
7 media policy violation?

8 **A. I -- I just don't remember. I -- I know**  
9 **that I was heavily involved in that case, but --**  
10 **and even the arbitration, but, now, I don't**  
11 **remember what the violation was.**

12 Q. Okay. Were -- were you involved in a  
13 disciplinary case involving Brandon Conlon (sic)?

14 **A. Well, Brandon was a senior director, so I**  
15 **-- I don't know of anything where he was issued**  
16 **discipline. He was not a flight attendant.**

17 Q. Okay. All right. In Kent Hand's case, do  
18 you know what he was terminated for?

19 **A. Off the top of my head, I believe that it**  
20 **was a social media policy violation and workplace**  
21 **violence.**

22 Q. Okay. And what are some of the details  
23 you recall about that -- that case?

24 **A. He -- I don't -- I don't remember if he**  
25 **posted a picture on Facebook, but there was a**

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1 **A. I don't know. I haven't -- I retired**  
2 **almost a year ago, so I don't know whether or not**  
3 **he's still employed at Southwest.**

4 Q. Okay. Do you know what a last-chance  
5 agreement is?

6 **A. Yes.**

7 Q. Okay. And what is it?

8 **A. It's an agreement that the company offers**  
9 **sometimes to flight attendants to -- to possibly**  
10 **reduce discipline that had been issued; and**  
11 **outlining that if you do X, Y or Z again, this is**  
12 **the result. So, basically, it's a -- you do this**  
13 **again -- this is your last chance; we'll -- we'll**  
14 **give you another chance, but this is it. It's just**  
15 **what it says; it's a last-chance agreement.**

16 Q. Okay. Do you help decide whether an  
17 employee should be offered a last-chance agreement?

18 **A. Sometimes, yes.**

19 Q. Okay. When do you make that decision?

20 **A. It depends on where -- where the flight**  
21 **attendant is in the grievance process. So after**  
22 **the Step 2 hearing, if the flight attendant decides**  
23 **to take the case forward to board of adjustment or**  
24 **to arbitration, at any point during that process, I**  
25 **could offer a last-chance agreement.**

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1 Q. Okay. Were you part of the decision to --  
2 well, let me ask it this way: Did you make the  
3 decision to offer Ms. Carter a last-chance  
4 agreement in this case?

5 **A. I did not.**

6 Q. Okay. Do you know who made that decision?

7 **A. I believe it was Mike Sims.**

8 Q. Okay. And how do you know that?

9 **A. Because Mike conducted the Step 2 hearing.**

10 **And I remember being told at that time that he was**  
11 **offering a last-chance agreement for reinstatement.**

12 Q. Okay. And which flight attendants, if  
13 any, have you offered a last-chance agreement to?

14 **A. I -- I don't know.**

15 Q. Okay.

16 **A. I would have to look it up.**

17 Q. All right. Now, do you know what Holly  
18 Imamovic was disciplined for?

19 **A. Yes. I don't remember exactly, but I**  
20 **believe that it was the social media policy and**  
21 **workplace violence.**

22 Q. Okay. And what -- what details about that  
23 case do you remember?

24 **A. Well, there were actually two cases.**  
25 **Holly was terminated. She was, I believe, brought**

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1 **passenger with some derogatory comments.**

2 Q. Okay. Do you remember what the derogatory  
3 comments were?

4 **A. No.**

5 Q. Okay. And do you know if he was rehired  
6 by the company? Or let me ask it another way.

7 Do you know if he received a  
8 last-chance agreement?

9 **A. I don't know.**

10 MR. GILLIAM: I don't know if we're at  
11 a lunch breaking point yet; are we?

12 MR. CORRELL: I mean, if you think you  
13 are going to have enough after lunch break to make  
14 a break worthwhile, we can stop.

15 MR. GILLIAM: Yeah, I probably will.

16 MR. CORRELL: Okay. That's fine by  
17 me.

18 MR. GILLIAM: Is that okay by you,  
19 Ms. Emlet?

20 THE WITNESS: Sure.

21 MR. GILLIAM: Okay.

22 THE VIDEOGRAPHER: We are off record  
23 at 12:15 p.m.

24 (Lunch break had.)

25 THE VIDEOGRAPHER: We are back on

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1 **back on a last-chance agreement. And then she**  
2 **violated the last-chance agreement and was**  
3 **terminated a second time.**

4 Q. Okay. What -- what conduct did she engage  
5 in that gave rise to the first termination?

6 **A. I don't remember. I -- I believe it was a**  
7 **social media violation. And -- but I don't**  
8 **remember -- I don't remember the specifics of what**  
9 **she did that -- that was a violation.**

10 Q. Okay. Do you remember what conduct gave  
11 rise to the second violation?

12 **A. She violated the -- the last-chance**  
13 **agreement by violating the social media policy.**

14 Q. Okay. And how did she violate the social  
15 media policy the second time?

16 **A. I don't remember.**

17 Q. Okay. And Bill Holcomb, what do you  
18 recall about his case?

19 **A. I believe that his was a social media**  
20 **violation. It may have also included sexual**  
21 **harassment, but I don't know for sure.**

22 Q. Okay. And do you know the specific  
23 conduct -- conduct he engaged in that violated the  
24 social media policy?

25 **A. I believe that he posted a photo of a**

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1 record at 1:01 p.m.

2 Q. (By Mr. Gilliam) All right. Ms. Emlet,  
3 and were -- were you familiar with any cases where  
4 Casey Rittner was accused of a policy violation?

5 **A. I -- I don't remember whether or not I was**  
6 **involved in Casey's cases. I believe I was in at**  
7 **least one.**

8 Q. What do you remember about Casey's cases?

9 **A. The one I worked on was the social media**  
10 **violation.**

11 Q. Okay. And what happened in that case?

12 **A. I have no idea.**

13 Q. Okay. Do you remember the conduct that  
14 constituted the social media violation?

15 **A. Casey posted something on -- on Facebook,**  
16 **but I don't remember what it was.**

17 Q. Okay. Do you remember anything about his  
18 other case?

19 **A. I only know of one that I was involved in.**

20 Q. Okay. And do you remember whether Casey  
21 was terminated for -- for the case you were  
22 involved in?

23 **A. I don't remember.**

24 Q. Okay. Do you remember anything else about  
25 that case?



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1 **A. I don't. I'm -- I'm not even sure if I am**  
2 **thinking of the right case, so I -- I really can't**  
3 **speak to any specifics.**  
4 Q. Okay. Are -- are you familiar with any  
5 cases where Glenn Thompson was accused of a social  
6 media violation?  
7 **A. Yes. But I don't think that I worked on**  
8 **that case.**  
9 Q. Okay. What do you know about that case?  
10 **A. Nothing. I don't remember anything --**  
11 Q. Okay.  
12 **A. -- about it.**  
13 Q. You just remember that he -- he was  
14 accused of a social media policy violation?  
15 **A. Yes.**  
16 Q. I am sorry. Policy violations, I said.  
17 Okay. Do you know if it was a social media policy  
18 violation?  
19 **A. I don't remember.**  
20 Q. Okay. Are you familiar with a case where  
21 Chris Slough was accused of a policy violation?  
22 **A. I don't recognize that name at all.**  
23 Q. Okay. Do you recognize the name Michael  
24 Kammas?  
25 **A. No.**

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1 Q. Okay. How about Brett Nevarez?  
2 **A. Yes.**  
3 Q. Okay. And who is Brett Nevarez?  
4 **A. He is a flight attendant. And at one**  
5 **time, he was a union board member, I believe.**  
6 Q. Okay. Are you --  
7 **A. Or --**  
8 Q. Oh, go ahead.  
9 **A. Officer, I think. He was a union officer.**  
10 Q. Okay. Are you aware of any case where he  
11 was accused of a policy violation?  
12 **A. I know that he was accused, yes.**  
13 Q. Okay. And what was the policy he was  
14 accused of violating?  
15 **A. I don't -- I don't know.**  
16 Q. Okay. Do you remember what the conduct  
17 was that gave rise to the accusation?  
18 **A. I don't. It -- I don't know. I don't**  
19 **remember.**  
20 Q. Okay. Do you recall when -- when that  
21 occurred?  
22 **A. It -- it might have been 2018.**  
23 Q. Okay. All right. Now, shifting gears a  
24 little bit. Do you know if any union board member  
25 -- I am sorry.

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1 Do you know if Audrey Stone ever  
2 reported another flight attendant for a policy  
3 violation?  
4 **A. I don't know whether she did.**  
5 Q. Do you know of a case where any union  
6 official ever reported an employee for a policy  
7 violation?  
8 **A. I do.**  
9 Q. Okay. And what do you recall?  
10 **A. I recall that one union leader gave some**  
11 **social media screenshots to one of the labor**  
12 **relations managers and asked to remain anonymous.**  
13 Q. Okay. To a labor relations manager, you  
14 said?  
15 **A. Yes.**  
16 Q. Okay. And who was that union leader?  
17 **A. I don't know. He -- they didn't give that**  
18 **to me.**  
19 Q. When you said they didn't give that to  
20 you, you mean the anonymous union leader?  
21 **A. Correct.**  
22 Q. So you knew that it was a union leader,  
23 though?  
24 **A. Yes.**  
25 Q. Okay. And how did you know it was a union

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1 leader?  
2 **A. Because the manager who received the**  
3 **information said it was.**  
4 Q. Okay. The -- the manager who received the  
5 information told you that they received information  
6 from a union leader?  
7 **A. Yes.**  
8 Q. Okay. And who was the labor relations  
9 manager; who told you that?  
10 **A. I think it was -- was Kevin.**  
11 Q. And what is Kevin's last name?  
12 **A. Let me tell you. Allen, A-l-l-e-n.**  
13 Q. Okay. Do you know what the information  
14 was that Kevin union -- I'm sorry -- Kevin Allen  
15 had received?  
16 **A. I don't remember what case it was.**  
17 Q. Okay. You don't remember the flight  
18 attendant who was being reported?  
19 **A. No.**  
20 Q. Okay. Do you remember when that was?  
21 **A. No, I don't. Two to three years ago.**  
22 Q. Okay. Do you know if Brian Talbert ever  
23 reported another flight attendant for a violation  
24 of one of Southwest's policies?  
25 **A. I believe he did, yes.**

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1 Q. Okay. And who did he report?  
2 **A. I don't remember.**  
3 Q. Do you remember what policy he reported  
4 the -- being violated?  
5 **A. I believe it was the social media policy.**  
6 Q. Okay. And do you remember when it was?  
7 **A. No.**  
8 Q. All right. Let's see. If I could mark as  
9 the next exhibit Document 26. I think it's Exhibit  
10 18.  
11 (Exhibit 18 marked.)  
12 Q. (By Mr. Gilliam) And, Ms. Emlet, if you  
13 could review this. And once you have had the  
14 chance to review it, let me know.  
15 **A. You say it's Document 18 or Exhibit 18?**  
16 Q. It -- it will be your Document 26.  
17 **A. I don't -- I don't think I have -- let's**  
18 **see. Oh, wait. Let's scroll down some more. More**  
19 **attachments. Okay.**  
20 Q. And -- and once you find it, review it.  
21 And once you have had the chance to review it, just  
22 let me know.  
23 **A. Okay.**  
24 Q. All right. And what is it? I am sorry.  
25 Do you recognize it?

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1 **A. Yes.**  
2 Q. And what is it?  
3 **A. It's an email thread that, I believe,**  
4 **originated with Brian Talbert alleging that**  
5 **different flight attendants had violated the social**  
6 **media policy. And then there is a spreadsheet**  
7 **that, I think, Julie O'Grady put together with**  
8 **names of flight attendants who needed to be**  
9 **contacted and addressed regarding the posts.**  
10 Q. Okay. And who is Julie O'Grady?  
11 **A. She was one of the -- or is one of the**  
12 **senior investigators with employee relations.**  
13 Q. Okay. All right. And the -- the chart  
14 you referred to -- or I am not sure which word you  
15 used, but is -- is that on -- are you talking about  
16 the one on 6351 through 6354?  
17 **A. Yes.**  
18 Q. Okay. And there is a column that says  
19 time and -- well -- well, I guess, hold up on -- on  
20 that a little bit. I guess, going -- going back --  
21 I am sorry. Going back to 5680, the first page.  
22 **A. Okay.**  
23 Q. And there is an email from Julie O'Grady  
24 to -- to you and Melissa Burdine and a few others.  
25 Do you know if this was the first you -- you would

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1 have been aware of Mr. Talbert's report?  
2 **A. It appears that that would be the case,**  
3 **yes.**  
4 Q. Okay. All right. Now, I guess, another  
5 question I have is: Who -- who are these other  
6 people? Who is Melissa Burdine?  
7 **A. Melissa Burdine was another labor**  
8 **relations manager.**  
9 Q. Okay. And she did what you did?  
10 **A. That's correct.**  
11 Q. Okay. And who is Carolene Goulbourne?  
12 **A. Carolene, at that time -- I -- she is**  
13 **currently the base manager in Oakland. And I think**  
14 **that she was at the time of this email as well.**  
15 Q. Okay. Do you know why she would be  
16 involved?  
17 **A. I know that she did some work in Phoenix.**  
18 **I think that they were without a base manager for a**  
19 **while, and Carolene may have been out there**  
20 **assisting.**  
21 Q. Okay. And who is Toni Hamilton?  
22 **A. She was the manager of employee relations.**  
23 Q. Okay. And, I am sorry, Deborah Edwards?  
24 **A. Well, at the time of this email, I am not**  
25 **sure if Deborah was the Phoenix-based manager; I**

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1 **think that she was. She has transitioned to a**  
2 **different position since then.**  
3 Q. Okay. And what did you do with this  
4 information when you received it?  
5 **A. I -- I don't remember.**  
6 Q. Okay. And on the -- the next page, if you  
7 could look at the next page, 5681.  
8 **A. Yes.**  
9 Q. Okay. And you sent an email to -- to  
10 Tammy Shaffer and copied Brianna Grant and -- I --  
11 well, here, it says, I think he's going through all  
12 of his archive files and digging up everything he  
13 can.  
14 What was he trying to obtain?  
15 **MR. CORRELL: Objection. Calls for**  
16 **speculation.**  
17 **MR. GILLIAM: I will ask it again.**  
18 Q. (By Mr. Gilliam) Do you know what he was  
19 trying to obtain?  
20 **A. No.**  
21 Q. Okay. And then it says, ER is working  
22 with the bases and Brian.  
23 And, I guess, do you know what  
24 employee relations was -- was working with the  
25 bases and Brian on?

1 **A. Well, Brian Talbert had brought forward a**  
2 **whole list of alleged social media violations. And**  
3 **so he -- and he brought his allegations to the**  
4 **employee relations team. So the -- employee**  
5 **relations, Brian and the base leader were working**  
6 **together to go through each of the allegations.**

7 Q. Okay. And then moving to the next email,  
8 next page, 4483.

9 **A. Yes.**

10 Q. And Julie O'Grady sends you an email,  
11 along with several other persons. And it looks  
12 like you -- you forward the email; is that -- I --  
13 I guess, do you know when Julie sent you that  
14 email?

15 **A. Well, not unless the date stamp is on**  
16 **here, but I don't see a date stamp on this email.**

17 Q. Okay. Yeah, I didn't either. And Julie  
18 says, after doing some additional research on the  
19 information Brian forwarded us -- to us on  
20 Wednesday, I did not see any additional information  
21 to investigate from an employee relations  
22 standpoint. And I found that some of the posts  
23 were previously brought forward to the company and  
24 addressed.

25 And then, I -- I guess, you forward it

1 to a group of people and say, I am not sure how  
2 this will influence your investigation.

3 What -- what investigation were you  
4 referring to?

5 **A. I believe it was the investigation of the**  
6 **-- the social media violation allegations on all of**  
7 **the flight attendants that were listed in the chart**  
8 **on this email thread.**

9 Q. Okay. And who -- who are those people  
10 that you are sending it to?

11 **A. Some of them were base managers and some**  
12 **of them were assistant base managers. And they**  
13 **were working at the bases of the flight attendants**  
14 **who had been accused of violating the policy.**

15 Q. Okay. And which -- I guess, from  
16 reviewing the information here, which -- which  
17 bases were they from?

18 **A. Well, I hope I remember. I think at the**  
19 **time, Joe was in Chicago. Brinkley Flanigan was**  
20 **Baltimore. Danielle Santiago was Baltimore. Brian**  
21 **Ridgeway, I believe, at this time, was senior**  
22 **manager over the Eastern region bases. Carolene**  
23 **Goulbourne was the manager in Oakland. Brett and**  
24 **Keith were assistant base managers in Oakland. And**  
25 **Dave Kissman was the senior manager over the**

1 **Western region of flight attendant bases.**

2 Q. Okay. All right. Do you remember having  
3 any phone conversations with them about their  
4 investigations?

5 **A. I don't remember.**

6 Q. Okay. And let's see. Going back to 6351.

7 **A. Yes.**

8 Q. Now, I guess, Julie O'Grady, in her email,  
9 says, after review of the attached information,  
10 below are the names of the flight attendants, the  
11 time and date of their comments in 2014; and the  
12 comment they made on social media could be  
13 perceived as retaliatory in nature.

14 And I think she goes on to say,  
15 reposting messages related to the protected  
16 categories that are derogatory, negative or sexual  
17 in nature could be a violations (sic) of the  
18 company policy concerning harassment, sexual  
19 harassment, discrimination and retaliation.

20 Now, do you -- do you know if there  
21 was actually a final determination that it -- it --  
22 these posts that are listed in this table did  
23 violate that policy?

24 **MR. CORRELL: Objection.**

25 Mischaracterizes the exhibit. You can answer as

1 you are able, Ms. Emlet.

2 **A. I don't know who or if anybody received**  
3 **discipline as a result of -- of these**  
4 **investigations.**

5 Q. (By Mr. Gilliam) Okay. And do you know  
6 if -- if any of these posts were deemed to violate  
7 one of Southwest's policies?

8 **A. I don't know.**

9 Q. Okay. Do you know who reached the -- I  
10 guess, the -- the decision on whether to issue  
11 discipline for these cases?

12 **A. Each of the decisions would have been made**  
13 **separately by the base leader where that flight**  
14 **attendant was domiciled.**

15 Q. Okay. And -- that exhibit -- okay. Now,  
16 were you involved in -- or I am sorry.

17 Were you aware of any cases where  
18 flight attendants were reported for their social  
19 media activities during a union campaign?

20 **A. I -- I don't know. I don't remember.**

21 Q. Okay. And are you aware if anyone --  
22 well, I guess, first of all, do you know who Greg  
23 Hofer is?

24 **A. Yes.**

25 Q. And who is Greg Hofer?

1 **A. I -- I don't know if he is still with the**  
2 **company, but when I retired, he was a flight**  
3 **attendant based out of Oakland.**  
4 Q. Okay. Do you know -- or I am sorry.  
5 Are you aware if anyone ever reported  
6 Greg Hofer for Facebook posts he made?  
7 **A. Yes.**  
8 Q. Okay. And what -- what do you remember  
9 about Greg Hofer being reported for Facebook posts?  
10 **A. I don't remember any details about what**  
11 **was posted or what the allegations were, but I do**  
12 **know that he was reported to have allegedly**  
13 **violated the social media policy.**  
14 Q. Okay. Do you know who reported him?  
15 **A. I don't remember.**  
16 Q. Okay. If I could mark as Exhibit 19,  
17 Document 23. Ms. Emlet, if you want to turn to  
18 that.  
19 (Exhibit 19 marked.)  
20 Q. (By Mr. Gilliam) And take an opportunity  
21 to review it. And once you have had a chance to  
22 review it, I will ask some questions.  
23 **A. Okay.**  
24 Q. All right. Do you recognize this?  
25 **A. I don't remember it, but I -- I recognize**

1 **the format.**  
2 Q. Okay. Do you know what it is?  
3 **A. Yes. It -- it looks like it's an email**  
4 **from me.**  
5 Q. Okay. And you -- I think you -- you sent  
6 it to Brianna Grant. And it says, I couldn't find  
7 much with Greg's name on it, but I am happy to keep  
8 looking if you like.  
9 Do you recall what she had asked you  
10 to look for?  
11 **A. No.**  
12 Q. Okay. And, I -- I guess, the Greg  
13 mentioned here, that -- is that Greg Hofer?  
14 **A. Yes.**  
15 Q. Okay. Okay. And what did Brianna, I  
16 guess, say to you when, I guess, you emailed and  
17 asked for -- asked if you want to dig deep -- if  
18 she wanted you to dig deeper?  
19 **A. I have no idea.**  
20 Q. Okay. Do you know if she responded to  
21 you?  
22 **A. I -- I don't know.**  
23 Q. Okay. And you say you did take  
24 screenshots of his most recent posts. Do you  
25 remember being out on his Facebook page looking for

1 posts?  
2 **A. I don't remember doing that, but it's --**  
3 **it says in the email that I did.**  
4 Q. Uh-huh. And you -- you also say, I think  
5 there is an interesting pattern of trying to milk  
6 the company for money.  
7 What -- what are you referring to when  
8 -- when you mention that pattern of --  
9 **A. I --**  
10 Q. -- milking the company?  
11 **A. I don't remember.**  
12 Q. Okay. Let's see. If -- at -- let's see.  
13 6346, still part of this document.  
14 **A. Okay. My last number is cut off, so can**  
15 **you tell me what is at the top of the page that you**  
16 **are referencing?**  
17 Q. It looks like a screenshot of a post. It  
18 has Greg Hofer's name on it and then it has a  
19 picture of a plane and a clock.  
20 **A. Okay. Okay. I have it.**  
21 Q. Okay. And did you read it?  
22 **A. Yes.**  
23 Q. Okay. Is -- could this be what you were  
24 referring to when you said there is a pattern of  
25 trying to milk the company for money?

1 MR. CORRELL: Objection. Calls for  
2 speculation. You can answer as you are able,  
3 Ms. Emlet.  
4 **A. I -- I don't see anything here that would**  
5 **suggest he was trying to milk the company for**  
6 **money.**  
7 Q. (By Mr. Gilliam) Okay. All right. And  
8 then if you could -- have you turn to 6345.  
9 **A. Yes.**  
10 Q. Okay. And you care to review those  
11 messages?  
12 **A. Yes.**  
13 Q. And is this the post you were referring to  
14 or are these the posts you were referring to when  
15 you said there is an interesting pattern of trying  
16 to topple the union?  
17 **A. I don't remember what I was referring to**  
18 **in that email.**  
19 Q. Okay. All right. Now, the -- these  
20 Facebook posts -- well, let me ask it this way:  
21 The documents numbered 6323 to 6350, were those  
22 attachments to this email you sent to Brianna?  
23 **A. I can't tell for sure whether they were or**  
24 **not because at the top of the email, it says that**  
25 **there are attachments, but I don't know if the --**



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1 the screenshots that are here are the same as the  
2 attachments in that heading.

3 Q. Okay. Do you know if you -- if you  
4 collected and produced this south -- I'm sorry --  
5 produced -- let me start over.

6 Do you know if you collected and  
7 produced this information in response to  
8 Ms. Carter's discovery requests?

9 **A. I have no idea.**

10 Q. Okay.

11 **A. The discovery request for this hearing?**

12 Q. This case, yes, ma'am.

13 **A. I was not involved in that at all.**

14 Q. Okay. Did you not collect or produce any  
15 information for Ms. Carter's discovery request?

16 **A. On this lawsuit?**

17 Q. In this case.

18 **A. No, I am -- I am not -- I don't even have  
19 access to that information anymore.**

20 Q. Okay. All right. Okay. And do you  
21 remember anything about the issue or question that  
22 Brianna Grant had originally emailed you about?

23 **A. No.**

24 Q. Okay. All right. Now, are you aware of  
25 whether Jeanna Jackson has ever reported any social

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1 **A. I have no idea.**

2 Q. Okay. Or do you know if those were the  
3 attachments to this document?

4 **A. I -- yeah, I -- I don't know. I don't  
5 even -- I don't know if those were the attachments.**

6 Q. Okay. Do you remember talking to Tammy  
7 Shaffer -- well, do you remember talking to Tammy  
8 Shaffer about either this email or the attachment  
9 -- or I am sorry.

10 Do you remember talking to Tammy  
11 Shaffer about this email or the screenshots?

12 **A. I don't remember.**

13 Q. Okay. Do you remember having any  
14 conversations about this email or the attachments  
15 with Mike Sims?

16 **A. No.**

17 Q. Okay. No, you didn't; or, no, you don't  
18 remember?

19 **A. I don't remember.**

20 Q. Okay. And who is Tammi Feuling?

21 **A. She is the Dallas base manager.**

22 Q. Okay. And in her email to you, the one at  
23 4:38 p.m., she says, I want to make sure these get  
24 to the proper bases for follow-up.

25 So was your understanding that she

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1 media violations?

2 **A. I believe she has.**

3 Q. Okay. And what do you remember about  
4 social media violations that she's reported?

5 **A. Nothing. I don't -- I don't remember what  
6 she reported.**

7 Q. Okay. Let's see. I could mark Document  
8 24 as Exhibit 20.

9 (Exhibit 20 marked.)

10 Q. (By Mr. Gilliam) And, Ms. Emlet, if you  
11 could review all of the pages in that document and  
12 let me know once you have had the chance to review  
13 all of those pages.

14 **A. Okay.**

15 Q. All right. Do you recognize this?

16 **A. I don't remember it.**

17 Q. Do you know what it is?

18 **A. Well, it's -- looks like it's an email  
19 from me to my leaders regarding possible social  
20 media violations for Jeanna Jackson. It looks like  
21 it was just an FYI email and that I forwarded it on  
22 -- information that I received from the base.**

23 Q. Okay. Do you know if the, I guess, two or  
24 three pages that follow, are those what you  
25 forwarded?

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1 wanted you to send this to base managers?

2 **A. No. I think that she was just informing  
3 me that she was forwarding the information to the  
4 appropriate base leaders.**

5 Q. Okay. And do you know which base leaders  
6 she's referring to?

7 **A. No, I don't know which bases were  
8 involved.**

9 Q. Okay. Okay. And do you know why she sent  
10 it to you; just as an FYI?

11 **A. I think so.**

12 Q. Okay. And she says, this is one of many  
13 coming your way.

14 I guess, one of many what; do you  
15 know?

16 **A. I don't remember.**

17 Q. Okay. Do you know -- do you remember if  
18 you ever communicated with Jeanna Jackson about  
19 this email?

20 **A. I do not believe I -- I don't remember  
21 ever handling any of Jeanna Jackson's cases -- and  
22 I -- so I would not have communicated with her.**

23 Q. Okay. Do you know who Alexandria Jeffers  
24 is?

25 **A. No.**

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1 Q. Okay. And do you know if anyone was ever  
2 disciplined for this report?

3 **A. I don't know.**

4 Q. Okay. And let's see. If I could direct  
5 you -- I think my page is maybe cut off as well,  
6 but the -- the third page in this series; it's one  
7 of the screenshots, I guess, or one of the  
8 pictures.

9 **A. Okay.**

10 Q. And then towards the very bottom, it says,  
11 as far as my involvement with 556.

12 Do you see where I am referring to?

13 **A. Yes.**

14 Q. Okay. And then it says, I attended a  
15 conference for human tra- -- trafficking and helped  
16 implement the human trafficking recurrent training  
17 module.

18 Do you know what that is, the human  
19 trafficking recurrent training module?

20 **A. I know a little bit about it.**

21 Q. And what is it?

22 **A. I thought that it was a program that was**  
23 **company-wide to educate all of our employees -- but**  
24 **specifically flight attendants -- of the signs to**  
25 **look out for, the warning signs for human**

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1 **trafficking. And then the resources to follow up**  
2 **if you suspected human trafficking on the aircraft.**

3 Q. Okay. And then she says, I served on the  
4 DMT.

5 Do you know what the DMT is?

6 **A. No.**

7 Q. Okay. And she says, I was a TA2 educator.

8 Do you know what a TA2 educator is?

9 **A. No.**

10 Q. Okay. Now, do you know if purpose -- if  
11 you -- well, strike that. I will start again.

12 Do you know if you ever reviewed  
13 social media posts by Dee Dee Merrick?

14 **A. That name does not sound familiar.**

15 Q. Okay. Do you know the name Eslandra  
16 Merrick?

17 **A. No.**

18 Q. Okay. Let's see. If I could mark as  
19 Exhibit 21, Document 25.

20 (Exhibit 21 marked.)

21 Q. (By Mr. Gilliam) So, Ms. Emlet, if you  
22 want to turn to Document 25.

23 **A. Is that an email? It looks like an email**  
24 **from me to employee relations?**

25 Q. Yes. There is 624 -- oh, wait, you don't

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1 -- the numbers cut off for you at the bottom still?

2 **A. This one is. And it's -- it doesn't --**  
3 **it's -- it's already opened, so I don't know -- I**  
4 **just wanted to verify that was the document you**  
5 **meant.**

6 Q. Sure, sure. Take a second to look it  
7 over. And once you have had the chance, let me  
8 know.

9 **A. Okay.**

10 Q. Do you recognize this?

11 **A. Well, I don't remember it.**

12 Q. Do you know what it is?

13 **A. It's an email from me to the employee**  
14 **relations team asking them to review fact-finding**  
15 **notes and it looks like Facebook posts for Dee Dee**  
16 **Merrick, to see if there -- if they felt that there**  
17 **were any violations against any protected**  
18 **categories.**

19 Q. Okay. From what I understand earlier --  
20 and please correct me if I am wrong -- you did not  
21 produce any documents in response to Ms. Carter's  
22 discovery requests, correct?

23 **A. That's correct.**

24 Q. Okay. So you don't know whether those  
25 fact-finding meeting notes -- these attachments

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1 that are referred to here in this email were  
2 produced?

3 **A. I don't know.**

4 Q. Okay. All right. And -- and you don't  
5 remember whether you received any responses to  
6 this?

7 **A. I don't know.**

8 Q. Okay. And you don't remember the case  
9 either?

10 **A. I don't remember the case at all.**

11 Q. Okay. And who is Brian Ridgeway?

12 **A. At the -- at the time, he was -- or I**  
13 **think he still is -- the senior manager for half of**  
14 **the inflight bases.**

15 Q. Do you know, was he senior manager for a  
16 particular region?

17 **A. Yes. And he was the senior manager for**  
18 **Graham Vandergrift.**

19 Q. And we've gone through so many names, so I  
20 think you told me. Did you tell me that he was  
21 senior manager for East Coast?

22 **A. Well, when I was there, he was. I don't**  
23 **know if that's been changed.**

24 Q. Yeah. And I -- I did mean at this time,  
25 in 2017.

1 **A. Yes.**  
2 Q. Okay. All right. Now, did you ever  
3 review any harassment complaints made by Bill  
4 Holcomb?  
5 **A. I believe I did.**  
6 Q. Okay. And what were those harassment  
7 complaints about?  
8 **A. I -- I don't remember.**  
9 Q. Okay. Do you remember when -- when you  
10 might have been involved in reviewing those  
11 complaints?  
12 **A. No.**  
13 Q. Okay. If I can mark as Exhibit 22,  
14 Document 27.  
15 (Exhibit 22 marked.)  
16 Q. (By Mr. Gilliam) Ms. Emlet, if you want  
17 to take a look at Document 27 and review all the  
18 pages. Once you have had a chance to take a look,  
19 let me know.  
20 **A. Okay.**  
21 Q. And do you recognize this?  
22 **A. I believe so, yes.**  
23 Q. Okay. And what is it?  
24 **A. This appears to be an email thread started**  
25 **by Bill Holcomb. He sent the original email to**

1 **Naomi Hudson. And then it's a series of emails**  
2 **discussing allegations that Bill brought forward**  
3 **against other flight attendants.**  
4 Q. Okay. And is she sending this information  
5 to you for an investigation?  
6 **A. I believe so, yes.**  
7 Q. Okay. And do you recall whether you had  
8 an existing investigation when you received this?  
9 **A. An existing investigation on this?**  
10 Q. Well, into any other matter involving  
11 flight attendants.  
12 **A. I -- my whole job was investigating flight**  
13 **attendants.**  
14 Q. Well, and I am sorry. I will try to ask  
15 this in a better way. Did you have another  
16 investigation that you were currently working on  
17 when you received this email that this information  
18 was relevant to?  
19 **A. I don't remember.**  
20 Q. Okay. Or was she sending this to you for  
21 you to take part in this investigation?  
22 **A. It would have been to take part in this**  
23 **specific investigation, but it -- it looks to me**  
24 **like I was not the primary on this case.**  
25 Q. And what does that mean, the primary?

1 **A. The labor manager who was doing the**  
2 **investigating.**  
3 Q. Okay. Let's see. And why -- why do you  
4 think that?  
5 **A. Because it appears that these emails were**  
6 **addressed to Bryan Smith, who, at the time, was --**  
7 **had the same job I had. And then I was CC'd on**  
8 **them.**  
9 Q. Okay. You are -- you are talking about  
10 5138 and the ones that follow?  
11 **A. Yes.**  
12 Q. Okay. Now, in 5198, she sends it directly  
13 to you, though, the -- the very first page.  
14 **A. Uh-huh.**  
15 Q. And --  
16 **A. I don't know why that would be unless she**  
17 **didn't realize that Brian was already working on**  
18 **it.**  
19 Q. Okay. And the very top email says from  
20 Maureen to Maureen. Did -- did you email it to the  
21 same inbox or did you email it to a different email  
22 address you have?  
23 **A. I have no idea. I might have accidentally**  
24 **deleted it and sent it back to myself; I don't**  
25 **know.**

1 Q. Okay. All right. Now, another question:  
2 Do you know any flight attendants that supported  
3 the recall?  
4 **A. I know there were flight attendants who**  
5 **supported it. I don't know their names.**  
6 Q. Okay. You don't know which flight  
7 attendants supported the recall?  
8 MR. CORRELL: Objection. Asked and  
9 answered.  
10 **A. I know -- I believe Jeanna Jackson**  
11 **supported the recall. Other than that, I don't**  
12 **know any specific names.**  
13 Q. (By Mr. Gilliam) Okay. Did you ever see  
14 the recall petition?  
15 **A. No.**  
16 Q. Okay. Now, did you ever discuss Charlene  
17 Carter's termination with Suzanne Stephensen?  
18 **A. I don't believe so.**  
19 Q. Okay. How about Meggan Jones?  
20 **A. It's possible, since she was involved in**  
21 **the -- I believe she was involved in the**  
22 **fact-finding meeting.**  
23 Q. Okay. Do you know what communications you  
24 might have had with Meggan Jones about --  
25 **A. No.**

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1 Q. Okay.

2 **A. Sorry.**

3 Q. And did you ever have any discussions  
4 about Charlene Carter's termination with Dave  
5 Kissman or Mike Sims?

6 **A. I don't remember whether I did or not. I**  
7 **just -- I don't remember.**

8 Q. Okay. Do you remember if you ever had any  
9 discussions about Charlene Carter's termination  
10 with Sonya Lacore or Naomi Hudson?

11 **A. I did not talk with Sonya Lacore. I don't**  
12 **believe I spoke to Naomi Hudson.**

13 Q. Okay. Did you ever have any  
14 communications with anyone about Charlene Carter's  
15 Step 2 proceedings?

16 **A. I don't remember if I discussed it with**  
17 **anyone. I was not at the Step 2.**

18 Q. Okay. You didn't have any involvement in  
19 the Step 2 proceedings?

20 **A. Not that I remember, no.**

21 Q. Do you know if anyone besides Audrey Stone  
22 complained about Charlene Carter's Facebook posts  
23 or messages?

24 **A. I don't know.**

25 Q. Okay. And at any point prior to your

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1 otherwise, I pass the witness.

2 MR. CORRELL: And Southwest renews its  
3 prior responses to those objections, and adds that  
4 Ms. Emlet is a non-party witness subject to  
5 subpoena, and Southwest reserves the right to move  
6 and quash any subsequent subpoenas served on  
7 Ms. Emlet.

8 EXAMINATION

9 BY MR. CORRELL:

10 Q. Ms. Emlet, before we finish today, I have  
11 just a couple of questions for you. First, do you  
12 understand that a part of Ms. Carter's claim  
13 concerns her contention that she was treated less  
14 favorably because she was a union objector?

15 **A. Yes.**

16 Q. Do you personally have any bias or animus  
17 against individuals who are union objectors?

18 **A. No.**

19 Q. Did you observe anything in Ms. Carter's  
20 termination process that led you to believe that  
21 her union objector status played any role in her  
22 termination?

23 **A. No.**

24 Q. You also understand that Ms. Carter is  
25 alleging that she was terminated because of her

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1 retirement, did you know how many recall supporters  
2 had been disciplined for a policy violation?

3 **A. No.**

4 MR. CORRELL: Objection. Calls for  
5 speculation. You can answer, Ms. Emlet.

6 **A. I do not know.**

7 Q. (By Mr. Gilliam) Okay. Let's see.

8 MR. GILLIAM: I think I'd like to take  
9 a short 10-minute break and then I might be done  
10 after that.

11 MR. CORRELL: Very good.

12 MR. GILLIAM: Okay.

13 THE VIDEOGRAPHER: We are off record  
14 at 1:55 p.m.

15 (Recess taken.)

16 THE VIDEOGRAPHER: We are back on  
17 record at 2:08 p.m.

18 MR. GILLIAM: I am done with my  
19 questions, but, as with prior days, we would  
20 reserve the right to reopen the deposition in the  
21 event that we would seek to conduct any follow-up  
22 discovery.

23 MR. CORRELL: And -- oh, go ahead.

24 Sorry.

25 MR. GILLIAM: I was going to say,

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1 religiously motivated pro-life views?

2 **A. Yes.**

3 Q. Do you personally have a position on the  
4 issue of abortion as between pro-life and  
5 pro-choice?

6 **A. Yes.**

7 Q. What is your position?

8 **A. I am pro-life.**

9 Q. Did you see anything in the course of the  
10 termination that led you to believe that  
11 Ms. Carter's termination was occasioned by the fact  
12 that she harbors religiously motivated pro-life  
13 beliefs?

14 **A. No.**

15 Q. Do you have any personal bias or animus  
16 against individuals who have pro-life beliefs?

17 **A. No.**

18 Q. Do you have any bias or animus against  
19 individuals based on their Christian faith?

20 **A. No.**

21 MR. CORRELL: I have no further  
22 questions for you, Ms. Emlet. I pass the witness.

23 MR. GREENFIELD: Ms. Emlet, you  
24 haven't heard much from me today. This is Adam  
25 Greenfield from defendants TWU Local 556. And I



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1 will reserve any questions for the time of trial.  
2 You are done for the day, ma'am.  
3 THE WITNESS: Thank you.  
4 THE VIDEOGRAPHER: We are off -- we  
5 are off record at 2:10 p.m. End of deposition.  
6 End of media.  
7 THE REPORTER: And, Mr. Correll, you  
8 want me to send you the original for reading and  
9 signing?  
10 MR. CORRELL: Yes, ma'am. I will  
11 route that to the witness.  
12 (End of Proceedings, 2:10 p.m.)  
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1 I, MAUREEN EMLET, have read the foregoing  
2 deposition and hereby affix my signature that same  
3 is true and correct, except as noted above.  
4  
5 \_\_\_\_\_  
6 MAUREEN EMLET  
7  
8 THE STATE OF \_\_\_\_\_  
9 COUNTY OF \_\_\_\_\_  
10  
11 Before me, \_\_\_\_\_, on this day  
12 personally appeared MAUREEN EMLET, known to me (or  
13 proved to me under oath or through \_\_\_\_\_) to  
14 be the person whose name is subscribed to the  
15 foregoing instrument and acknowledged to me that  
16 they executed the same for the purposes and  
17 consideration therein expressed.  
18  
19 Given under my hand and seal of office this \_\_\_\_\_  
20 day of \_\_\_\_\_, 2020.  
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1 \_\_\_\_\_ was not requested by the deponent and/or  
2 a party before the completion of the deposition.

3 I further certify that I am neither  
4 attorney nor counsel for, nor related to or  
5 employed by any of the parties to the action in  
6 which this deposition is taken and further that I  
7 am not a relative or employee of any attorney of  
8 record in this cause, nor am I financially or  
9 otherwise interested in the outcome of the action.

10 The amount of time used by each party at  
11 the deposition is as follows:

12 Mr. Gilliam - 3:42 hours/minutes

13 Mr. Correll - 2 minutes

14  
15 Subscribed and sworn to on this 12th day  
16 of November, 2020.



17  
18 Charis M. Hendrick  
19 CHARIS M. HENDRICK, CSR # 3469

20 Certification Expires: 10-31-21  
21 Bradford Court Reporting, LLC  
22 7015 Mumford Street  
23 Dallas, Texas 75252  
24 Telephone 972-931-2799  
25 Facsimile 972-931-1199  
Firm Registration No. 38

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